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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LOS ANGELES WATERKEEPER, a
California non-profit association,

Plaintiff,

v.

RALPHS GROCERY COMPANY, an
Ohio stock corporation,

Defendant.

Case No.: **23 CV 9110 JFW (AJRx)**

CONSENT DECREE

CONSENT DECREE

WHEREAS, Plaintiff Los Angeles Waterkeeper (“LA Waterkeeper” or “Plaintiff”) is a 501(c)(3) non-profit public benefit corporation organized under the laws of the State of California, with its main office in Los Angeles, California;

WHEREAS, LA Waterkeeper is dedicated to the preservation, protection and defense of the surface, ground, coastal and ocean waters of Los Angeles County from all sources of pollution and degradation;

WHEREAS, Ralphs Grocery Company (“Ralphs” or “Defendant”) owns and operates a facility at 2201 S. Wilmington Avenue in Compton, California, 90220, under Waste Discharger Identification number 4 19I000841 (“Facility”);

WHEREAS, Ralphs is an establishment primarily engaged in furnishing “over-the-road” trucking services or trucking services and storage services. SIC Codes 4213;

WHEREAS, Ralphs contends that neither the National Pollutant Discharge Elimination System (“NPDES”) General Permit No. CAS000001 [State Water Resources Control Board] Water Quality Order No. 92-12-DWQ, as amended by Order No. 97-03-DWQ, as superseded by Order No. 2014-0057-DWQ and amended by Order No. 2015-0122-DWQ and Order 2018-0028-DWQ (“General Permit”)¹ nor the federal NPDES program for storm water discharges associated with industrial activities apply to drainages at transportation facilities that are not associated with specified industrial activities, and LA Waterkeeper disputes this contention, but LA Waterkeeper and Ralphs (together, the “Settling Parties”) have compromised to allow for settlement of this matter notwithstanding said disagreement, with the parties’ legal obligations to each other defined by this Agreement, and each party reserving all

¹ Any references to the “General Permit” herein shall be to the then-effective version, regardless of whether such changes are the result of amendments, revisions, reissuance, or similar modification of material terms. Any reference in this Consent Decree to specific sections or subsections of the General Permit that are moved, modified, or otherwise changed in a subsequent version of the General Permit shall be to such subsequent reference(s) as if set forth herein, e.g., the current §XI.B.6.c may be renumbered as §XI.B.7.c, combined into the current §XI.B.6.d, or split into a new §XI.B.6.c and §XI.B.6.d.

1 rights unless expressly stated to the contrary herein;

2 **WHEREAS**, subject to the Settling Parties’ disagreement discussed above,
3 storm water associated with vehicle maintenance (including vehicle rehabilitation,
4 mechanical repairs, painting, fueling, and lubrication) and equipment cleaning as
5 defined in 40 C.F.R. § 122.26(b)(14)(viii), or other operations identified under the
6 General Permit as associated with industrial activity, from the Facility are regulated
7 by the General Permit and the Federal Water Pollution Control Act, 33 U.S.C. §§
8 1251 *et seq.* (“Clean Water Act” or “CWA”), Sections 301(a) and 402, 33 U.S.C. §§
9 1311(a), 1342 (“Regulated Industrial Activities”);

10 **WHEREAS**, the Regulated Industrial Activities occurring at the Facility
11 include vehicle maintenance (including vehicle rehabilitation, mechanical repairs,
12 painting, fueling, and lubrication) and equipment cleaning as defined in 40 C.F.R. §
13 122.26(b)(14)(viii) as depicted on the Site Plan attached hereto as Exhibit A;

14 **WHEREAS**, the General Permit requires all permittees, including Ralphs, to
15 comply with, inter alia, the following mandates: (1) develop and implement a storm
16 water pollution prevention plan (“SWPPP”) and a storm water monitoring
17 implementation plan (“MIP”), (2) control pollutant discharges using, as applicable,
18 best available technology economically achievable (“BAT”) or best conventional
19 pollutant control technology (“BCT”) to prevent or reduce pollutants through the
20 development and application of Best Management Practices (“BMPs”), which must
21 be included and timely updated in the SWPPP, (3) reduce and eliminate discharges
22 necessary to comply with any and all applicable Water Quality Standards (“WQS”),
23 and (4) implement a monitoring and reporting program designed to assess compliance
24 with the General Permit;

25 **WHEREAS**, on June 1, 2023, Plaintiff issued a notice of intent to file suit
26 (“60-Day Notice”) to Ralphs, its registered agent, the Administrator of the United
27 States Environmental Protection Agency (“EPA”), the Executive Director of the State
28 Water Resources Control Board (“State Board”), the Executive Director Los Angeles

1 Regional Water Quality Control Board (“Regional Board” or “RWQCB”), and the
2 Regional Administrator of EPA Region IX, alleging violations of the Clean Water
3 Act and the General Permit Water Quality Order 2014-0057-DWQ, as amended by
4 Order Nos. 2015-0122-DWQ and 2018-0028-DWQ incorporating: 1) Federal
5 Sufficiently Sensitive Test Method Ruling; 2) Total Maximum Daily Load
6 Implementation Requirements; and 3) Statewide Compliance Options Incentivizing
7 On-Site or Regional Storm Water Capture and Use, at the Facility;

8 **WHEREAS**, on October 27, 2023, LA Waterkeeper filed a complaint against
9 Ralphs in the Central District of California, Civil Case No. 2:23-cv-09110
10 (“Complaint”);

11 **WHEREAS**, Plaintiff’s Complaint alleged violations of the General Permit
12 and the Clean Water Act for Ralphs’ discharges of pollutants into storm drains and
13 surface waters, including Compton Creek, the Los Angeles River, and San Pedro
14 Bay. (“Receiving Waters”);

15 **WHEREAS**, Ralphs denies all the violations set forth in LA Waterkeeper’s
16 complaint;

17 **WHEREAS**, LA Waterkeeper and Ralphs (collectively “Settling Parties” or
18 “Parties”) agree that it is in their mutual interest to enter a Consent Decree setting
19 forth terms and conditions appropriate to resolving the allegations set forth in the 60-
20 Day Notice and Complaint without further proceedings;

21 **WHEREAS**, all actions taken by the Settling Parties pursuant to this Consent
22 Decree shall be made in compliance with all applicable federal, state, and local laws,
23 rules, and regulations.

24 **NOW, THEREFORE, IT IS HEREBY STIPULATED BETWEEN THE**
25 **SETTLING PARTIES AND ORDERED AND DECREED BY THE COURT AS**
26 **FOLLOWS:**

27 1. The Court has jurisdiction over the subject matter of this action pursuant
28 to Section 505(a)(1)(A) of the CWA, 33 U.S.C. § 1365(a)(1)(A).

2. Venue is appropriate in the Central District Court pursuant to Section 505(c)(1) of the CWA, 33 U.S.C. § 1365(c)(1), because the Facility at which the alleged violations are taking place is located within this District.

3. The Complaint states a claim upon which relief may be granted against Ralphs pursuant to Section 505 of the CWA, 33 U.S.C. § 1365.

4. LA Waterkeeper has standing to bring this action.

5. The Court shall retain jurisdiction over this action for purposes of interpreting, modifying, or enforcing the terms of this Consent Decree, or as long thereafter as necessary for the Court to resolve any motion to enforce this Consent Decree, but only regarding issues raised within the Term of this Consent Decree.

I. OBJECTIVES

6. It is the express purpose of the Settling Parties through this Consent Decree to further the objectives of the Clean Water Act, and to resolve all issues alleged by LA Waterkeeper in its 60-Day Notice and Complaint. These objectives include compliance with the provisions of this Consent Decree, and compliance with all terms and conditions of the General Permit, and compliance with all applicable sections of the CWA.

7. Considering these objectives and as set forth fully below, the Parties agree to comply with the provisions of this Consent Decree, and terms and conditions of the General Permit, and all applicable sections of the CWA at the Facility.

II. AGENCY REVIEW AND CONSENT DECREE TERM

A. AGENCY REVIEW OF CONSENT DECREE

8. Agency Review. LA Waterkeeper shall submit this Consent Decree to the United States Department of Justice and the EPA (the “Federal Agencies”) for agency review consistent with 40 C.F.R. § 135.5. The agency review period expires forty-five (45) calendar days after receipt by the Federal Agencies, as evidenced by certified return receipts, or upon the date that the Federal Agencies provide a no objection letter, whichever is earlier (“Agency Review Period”). If the Federal

1 Agencies object to entry of this Consent Decree or to any portion of this Consent
 2 Decree, the Parties agree to meet and confer to attempt to resolve the issue(s) raised
 3 by the Federal Agencies. If the Parties are unable to resolve any issue(s) raised by the
 4 Federal Agencies in their comments, the Parties agree to expeditiously seek a
 5 settlement conference with the assigned Magistrate Judge to resolve any issue(s).

6 9. Court Notice. Plaintiff shall notify the Court of the receipt date by the
 7 Federal Agencies, as required by 40 C.F.R. § 135.5, to coordinate the Court's
 8 calendar with the 45-day review period.

9 10. Entry of Consent Decree. Following the expiration of the Agency
 10 Review Period, Plaintiff shall submit the Consent Decree to the Court for entry.

11 **B. DEFINITIONS**

12 11. Unless otherwise expressly defined herein, terms used in this Consent
 13 Decree which are defined in the General Permit have the meaning assigned to them in
 14 Attachment C of the General Permit. Whenever terms listed below are used in this
 15 Consent Decree, the following definitions apply:

- 16 a. "Consent Decree" means this Consent Decree and any
 17 attachments or documents incorporated by reference.
- 18 b. "Day" means a calendar day. In computing any period under this
 19 Consent Decree, where the last day of such period is a Saturday,
 20 Sunday, or Federal or State Holiday, the period runs until the
 21 close of business on the next day that is not a Saturday, Sunday, or
 22 Federal or State Holiday.
- 23 c. "Discharge Point" means each outfall and discharge location
 24 designated in the then-current SWPPP for the Facility.
- 25 d. "Effective Date" means the effective date of this Consent Decree,
 26 which shall be the date of the expiration of the Agency Review
 27 Period.

- e. “Entry Date” means the day this Consent Decree is approved and entered by the Court.
- f. “PPT” means Pollution Prevention Team as described in General Permit Section X.D.1.
- g. “Qualified Industrial Storm Water Practitioner” or “QISP” shall have the definition set forth in Section IX.A.1. of the General Permit.
- h. “Qualifying Storm Event” or “QSE” shall have the definition set forth in Section XI.B.1 of the General Permit.
- i. “Reporting Year” means the period from July 1 of a given calendar year to June 30 of the following calendar year.
- j. “SMARTS” means the California State Water Resources Control Board’s Stormwater Multiple Application and Report Tracking System located at <https://smarts.waterboards.ca.gov/smarts/faces/SwSmartsLogin.xhtml>.
- k. “
- l. “SWPPP” means a Storm Water Pollution Prevention Plan as defined in Section X of the General Permit.
- m. “Term” means the period between the Effective Date and the “Termination Date.”
- n. “Termination Date” means the date that all accrued monetary obligations in this Consent Decree have been met and one of the following events has occurred:
 - i. June 30, 2027, if no proceeding or process to enforce this Consent Decree was initiated prior to June 30, 2027, or seven (7) calendar days from the conclusion of any

proceeding or process to enforce the Consent Decree initiated prior to June 30, 2027; or

ii. Ralphs satisfies the requirements of and the Regional Board approves a Notice of Termination pursuant to Section II.C of the General Permit or a Notice of Non-Applicability pursuant to Section XX.C of the General Permit for all of the Facility, or all portions of the Facility where Regulated Industrial Activities occur, and Ralphs provides written notification to LA Waterkeeper of the Regional Board's approval.

o. "Wet Season" means the seven-month period beginning October 1st of any given calendar year and ending April 30th of the following calendar year.

III. COMMITMENTS OF THE SETTLING PARTIES

A. STORM WATER POLLUTION CONTROL BEST MANAGEMENT PRACTICES

12. Non-Storm Water Discharge Prohibition: Ralphs shall fully comply with General Permit Section IV.

13. Current and Additional Best Management Practices: In addition to maintaining the current BMPs described in the Facility's SWPPP attached hereto as Exhibit C, Ralphs shall develop and implement additional BMPs necessary to comply with the provisions of this Consent Decree and the General Permit.

14. Rain Gauge/Sensor. Ralphs will continue to employ its current rain gauge sensor. The sensor activates in rain events greater than 0.1 inches and redirects storm water that would otherwise discharge to the sanitary sewer. Ralphs maintains records of each time the system is used. If Ralphs fails to collect and analyze samples from four QSEs during a Reporting Year, Ralphs shall make these records available for LA Waterkeeper's review via email within ten (10) business days of the request for said documents by LA Waterkeeper, provided that LA Waterkeeper shall

request said documents no more than once during each calendar year of this Consent Decree. Data from the rain gauge/sensor shall be conclusive of precipitation quantities in events greater than 0.1 inches and timing for purposes of this Consent Decree provided, however, that the Parties agree that the rain gauge data shall not be conclusive of whether a discharge of storm water associated with industrial activities occurred or when such discharge commenced for the purposes of determining Ralphs compliance with its obligations under the General Permit or this Consent Decree. Rain gauge data and all communications between the Settling Parties related thereto, described herein shall be deemed confidential. Ralphs shall not be required to upload the rain gauge data to SMARTS. LA Waterkeeper shall not use the rain gauge data for any purpose other than as a confidential and informational communication, or as necessary as evidence in any dispute resolution proceeding.

15. Structural and Non-Structural BMPs for the Facility. Within thirty (30) days of the Effective Date, Ralphs shall confirm that the following BMPs have been implemented at the Facility as further described in the SWPPP attached hereto:

- a. Implement a sweeping program as detailed in its SWPPP pursuant to provision X.H.1.a. of the General Permit;
- b. During the Wet Season, maintain the wattles/filters/socks BMPs SWPPP pursuant to provision X.H.1.b. of the General Permit;
- c. In addition, rain event and monthly inspections described in paragraph paragraphs 24 and 25 below, PPT personnel will conduct an annual Pre-Rain Inspection at the beginning of the Reporting Year. The inspection will include the following elements:
 - i. Inspection of the site for any areas of dirt and debris accumulation.
 - ii. Removal of dirt and debris from targeted areas.

- iii. Inspection of catch basin inserts and insert media. Replace as necessary, based upon observations and manufacturers' recommendations.
- iv. Inspect for any spills or leaks and cleanup immediately as necessary.
- v. Confirm all waste/trash/recycle bins are closed or covered.
- d. Institute an equipment washing and vehicle maintenance program as detailed in its SWPPP pursuant to provision X.H.1.b. of the General Permit.
- e. To the extent vehicle fueling/maintenance or equipment washing occurs in areas other than those designated for such activities in the SWPPP site map, then appropriate BMPs will be deployed in compliance with the General Permit.

B. SAMPLING AT THE FACILITY

16. Ralphs shall develop a monitoring program consistent with General Permit Section XI. During the Term, Ralphs shall collect samples of storm water discharge when feasible based upon weather, safety conditions, and adequate amounts of discharge from each Discharge Point to permit such collection from each Discharge Point from at least four (4) Qualifying Storm Events, including, at minimum, the first two (2) Qualifying Storm Events during the first half of the Reporting Year and the first (2) two Qualifying Storm Events during the second half of the Reporting Year. Such sampling shall take place within the four (4) hour period required by the General Permit § XI.B.5. Should Ralphs be unable to collect the requisite number of samples, it shall provide a written explanation pursuant to General Permit § XVI.

17. Sampling Parameters: All samples collected pursuant to this Consent Decree shall be analyzed, at minimum, for the parameters listed in Table 1. Should Defendant conduct sampling for any additional parameters or cease sampling for any

1 of the parameters listed in Table 1 that are listed in 40 C.F.R. § 131.38 and/or in the
2 General Permit at the sampling locations described in Ralphs' then-current SWPPP
3 pursuant to Section XI.B of the General Permit that would otherwise be reportable on
4 SMARTS for any reason, including without limitation as a result of changed
5 operations, a revised pollutant source assessment, or a new mandate from a regulatory
6 agency, such parameter shall be treated as if listed in Table 1 for the purposes of this
7 Consent Decree, including the ARS requirements below, and the Settling Parties shall
8 meet and confer regarding the applicable Table 1 limit for such purposes.

9 18. Laboratory and Holding Time. Except for pH samples, delivery of all
10 samples to a California state certified environmental laboratory for analysis within
11 allowable hold times when feasible to do so, pursuant to 40 C.F.R. Part 136 and
12 Section XI.B.10 of the General Permit. Analysis of pH will be completed onsite using
13 a calibrated portable instrument for pH in accordance with the manufacturer's
14 instructions.

15 19. Detection Limit: Ralphs shall request that the laboratory use analytical
16 methods adequate to detect the individual contaminants at or below the values
17 specified in the General Permit and Table 1 below.

18 20. Reporting: Defendant shall upload and certify on SMARTS the complete
19 laboratory results, including a copy of the Quality Assurance/Quality Control and the
20 laboratory report, for all samples collected at the Facility pursuant to Paragraph 16
21 above within ten (10) days of receiving the laboratory results, and shall notify LA
22 Waterkeeper that the foregoing has been uploaded to SMARTS and certified within
23 five (5) days of certification.

24 **C. REDUCTION OF POLLUTANTS IN DISCHARGES**

25 21. Table 1 Numeric Limits: Ralphs shall develop and implement BMPs to
26 reduce pollutants in storm water at the Facility to levels below those in Table 1.
27
28

TABLE 1²

Analytes	Values	Source of Limit
Total Suspended Solids	100 mg/L (annual); 400 mg/L (instantaneous)	General Permit NAL
Total Zinc	0.159 mg/L (instantaneous)	General Permit NEL
Total Lead	0.094 mg/L (instantaneous)	General Permit NEL
Total Copper	0.0332 mg/L (annual); 0.06749 mg/L (instantaneous)	General Permit NAL/ General Permit NEL
Oil and Grease	15 mg/L (annual); 25 mg/L (instantaneous)	General Permit NAL
pH	6.5-8.5 s.u. (instantaneous)	Basin Plan
Nitrate + Nitrite as N	0.68 mg/L (annual); 8.0 mg/L (instantaneous)	General Permit NAL/ General Permit NEL

22. Table 1 Exceedances. An “Exceedance” of Table 1 is defined as follows:

(a) where the concentration of any pollutant in any two (2) storm water samples from the same Discharge Point at the Facility during a Reporting Year exceed an annual numeric limit contained in Table 1;³ and/or (b) where the concentration of any

² The numeric limits listed in Table 1 are for reference only, and the Table 1 limit for such parameter shall be the then-effective limit provided by the applicable source, e.g., if the source for TSS is listed as its NAL and the annual NAL for TSS is either increased to 110 mg/L or decreased to 90 mg/L, such new annual NAL, and not 100 mg/L, shall be used as the Table 1 limit for the purposes of this Consent Decree as if set forth herein.

³ As examples: (i) samples from both Sample Location #1 and Sample Location #2 exceeding the 0.0332 mg/L standard for copper on December 28, 2024; (ii) samples from Sample Location #1 exceeding the 0.0332 mg/L standard for

1 pollutant in any storm water sample from the Facility exceeds an instantaneous
2 numeric limit contained in Table 1.

3 23. Analyte Reduction Strategy for Table 1 Exceedances: As of the
4 Effective Date, and for the remainder of the Term, if Ralphs' storm water samples, as
5 required herein, reveal one (1) or more Exceedances, as defined in Paragraph 22
6 above not previously addressed in a prior ARS for the same Reporting Year, Ralphs
7 shall submit a plan to LA Waterkeeper for reducing the level of the applicable
8 pollutants from the applicable drainage area to the numeric limits specified in Table 1
9 ("Analyte Reduction Strategy" or "ARS") on the form attached hereto as Exhibit B.

10 a. The complete ARS, using the template attached hereto as Exhibit
11 B, must be submitted to LA Waterkeeper within thirty (30) days
12 of Ralphs's receipt of the laboratory report demonstrating the
13 Exceedance, as defined in Paragraph 22 above.⁴ In the event of
14 exceedances for multiple analytes and/or for multiple Sample
15 Locations, Ralphs shall submit a single ARS addressing multiple
16 analytes and multiple Sample Locations. Ralphs shall not be
17 required to submit more than one (1) ARS for each half of the
18 Reporting Year.

19 b. BMP Implementation. The ARS's time schedule(s) for
20 implementation of any BMPs shall ensure that Ralphs implements
21 all BMPs identified in the ARS as soon as possible, but in no
22 event later than ninety (90) days following the ARS becoming
23 "final" pursuant to Paragraph 23.d. below, unless a later
24 implementation date is mutually agreed upon by the Settling
25

26 copper on December 28, 2024 and on March 15, 2025; or (iii) a sample from Sample Location #1 exceeding the 0.0332
27 mg/L standard for copper on December 28, 2024, and a sample from Sample Location #2 exceeding the 0.0332 mg/L
standard for zinc on March 15, 2024.

28 ⁴ The ARS discussed in this Consent Decree is a separate and distinct requirement from any "Action Plan" or
Exceedance Response Actions discussed in the General Permit, though actions taken to comply with the ARS may be
used by Ralphs to demonstrate compliance with the General Permit.

1 Parties. Within ten (10) days of each of the BMPs set forth in the
2 ARS being implemented, Defendant shall confirm to LA
3 Waterkeeper in writing, with photographs where applicable as
4 determined by Ralphs, that such BMP has been implemented as
5 set forth in the ARS.

6 c. ARS Proposed BMPs: The following BMPs should generally be
7 evaluated for inclusion, but are not required to be included, in
8 ARSs to attain the Table 1 levels in the Facility's storm water
9 discharges:

10 i. Hydrologic Controls: Installation of additional berms or
11 equivalent structural controls necessary to reduce or prevent
12 storm water from flowing off site other than through the
13 engineered storm water conveyance system or storm water
14 retention or treatment facilities.

15 ii. Sweeping: The increased/more frequent use of sweepers
16 and manual sweeping in otherwise inaccessible areas.

17 iii. Treatment Systems: Installing additional components or
18 systems, or otherwise improving, an advanced storm water
19 treatment system, or making changes to the operation and
20 maintenance protocols for such system, to provide more
21 effective filtration treatment of storm water prior to
22 discharge.

23 iv. Evaluation of Existing BMPs: Replacing, rehabilitating, or
24 eliminating existing BMPs, taking into account the age of
25 the BMPs involved or employed, the engineering aspect of
26 the application of various BMPs, and any adverse
27 environmental impact of the BMPs.
28

- 1 d. ARS Review: LA Waterkeeper shall have thirty (30) days upon
2 receipt of Defendant's complete ARS to provide Defendant with
3 comments, on the form attached hereto as Exhibit B. LA
4 Waterkeeper not providing written comments within thirty (30)
5 days shall constitute irrefutable evidence that LA Waterkeeper is
6 satisfied with the content and conclusions set forth in the ARS.
7 Within thirty (30) days of receiving LA Waterkeeper's proposed
8 revisions to an ARS, if any, Defendant shall consider each of LA
9 Waterkeeper's recommended revisions and accept them or justify
10 in writing, on the form attached hereto as Exhibit B, why any
11 comment is not incorporated. Defendant's decision not to adopt
12 any of LA Waterkeeper's suggestions regarding an ARS shall not
13 impact the otherwise applicable schedule for implementing any
14 other revision to the SWPPP or MIP set forth in the ARS. The
15 ARS shall be considered "final" upon Defendant's submission of
16 its response, or thirty (30) days after LA Waterkeeper's receipt of
17 Defendant's complete ARS if LA Waterkeeper does not provide
18 written comments by such time. ARS(s) developed and
19 implemented pursuant to this Consent Decree are an obligation of
20 this Consent Decree. Any disputes as to the adequacy of an ARS
21 shall be resolved pursuant to the dispute resolution provisions of
22 this Consent Decree, set out in Section IV below. Disputes
23 regarding the adequacy of a particular BMP shall not impact the
24 schedule for implementing any other BMP set forth in the ARS.
- 25 e. Defendant shall revise the then-current SWPPP to reflect the
26 changes required by the ARS, as set forth in Paragraph 29.a
27 below.
28

f. ARS Payments: Defendant shall pay Five Thousand Dollars (\$5,000.00) each time an ARS is submitted to LA Waterkeeper at the same time that the ARS is submitted. Payments shall be made to “Los Angeles Waterkeeper” via certified mail, return receipt requested to Los Angeles Waterkeeper, c/o Barak Kamelgard, 360 E 2nd Street Suite 250, Los Angeles, CA 90012. Failure to submit a payment as required under this Paragraph will constitute a breach of the Consent Decree.

g. The ARS, and all communications between the Settling Parties related thereto, described in Paragraph 23 herein shall be deemed confidential. Ralphs shall not be required to upload the ARS to SMARTS. LA Waterkeeper shall not use the ARS for any purpose other than as a confidential and informational communication, or as necessary as evidence in any dispute resolution proceeding.

D. VISUAL OBSERVATIONS

24. Storm Water Discharge Observations: During the Term, Ralphs’ PPT members shall conduct visual observations during the Facility’s operating hours during pursuant to Section XI.A.2 of the General Permit.

25. Monthly Visual Observations: During the Term, Ralphs’ PPT members shall conduct monthly visual observations of the Facility pursuant to General Permit § XI.A and as further described in its SWPPP.

26. Visual Observations Records: Ralphs shall maintain observation records to document compliance with Paragraphs 24 and 25. In the event that Ralphs is required to prepare an ARS, Ralphs shall make these records available for LA Waterkeeper’s review via email within ten (10) business days of the request for said documents by LA Waterkeeper, provided that LA Waterkeeper shall request said documents no more than once during each calendar year of this Consent Decree.

1 27. Employee Training Program: Ralphs shall continue to implement a
 2 training program for PPT personnel as described in its SWPPP that incorporates the
 3 requirements set forth in the General Permit at I.I.63, IX.1.3, X.H.1.f, X.H.1.g.iii, and
 4 the fact sheet at I.D.4, and II.I.2.i.;

- 5 a. Training shall be provided as described in Ralphs' SWPPP and as
 6 further described in the General Permit at IX.A.;
- 7 b. Sampling Training: Ralphs shall designate an adequate number of
 8 PPT members sufficient to collect storm water samples as
 9 described in its SWPPP and as required by General Permit section
 10 XI.B.;
- 11 c. Visual Observation Training: Ralphs shall provide training to PPT
 12 members on how and when to properly conduct visual
 13 observations as described in its SWPPP and pursuant to General
 14 Permit section XI.A.;
- 15 d. Non-Storm Water Discharge Training: Ralphs shall train PPT
 16 members regarding Non-Storm Water Discharges as described in
 17 its SWPPP and pursuant to Section III and IV of the General
 18 Permit;
- 19 e. Employees: All PPT members at the Facility shall participate in an
 20 annual Training Program. New PPT members who join the PPT
 21 during the Wet Season shall participate in a Training Program
 22 within thirty (30) business days of their becoming a member of
 23 the PPT as described in its SWPPP pursuant to section X.H.1.f. of
 24 the General Permit;
- 25 f. Records: Ralphs shall maintain training records pursuant to
 26 General Permit section X.H.1.g.iii, and if Ralphs is required to
 27 prepare an ARS, shall provide LA Waterkeeper with a redacted
 28

copy of these records⁵ within ten (10) days of receipt of a written request, provided that LA Waterkeeper shall request such records no more than once during each calendar year of this Consent Decree.

28. Initial SWPPP Revisions: Ralphs and LA Waterkeeper have met and conferred about Ralphs' SWPPP and Ralphs agrees to upload and certify to SMARTS the revised SWPPP attached hereto as Exhibit C, which the Settling Parties agree fully complies with the requirements of the General Permit and this Consent Decree.

29. Additional SWPPP Revisions:

- a. Within thirty (30) days after any ARS has become final pursuant to Paragraph 23.d. above (or resolution pursuant to Dispute Resolution), Defendant shall revise the then-current SWPPP to reflect the changes required by the ARS and shall upload and certify on SMARTS the revised SWPPP. Ralphs shall notify LA Waterkeeper that the foregoing has been uploaded to SMARTS and certified within five (5) days of certification.
- b. Within thirty (30) days after any changes in industrial activities, sources of industrial pollutants, changes to Discharge Points, or changes to sections of the SWPPP identified in the SWPPP as requiring a SWPPP revision (including but not limited to, changes in Facility contacts or PPT members, changes or additions of BMPs, or changes in or additions of industrial activities that impact storm water discharge), Defendant shall revise the then-current SWPPP to reflect such changes and shall upload and certify on SMARTS the revised SWPPP. Ralphs shall notify LA

⁵ Pursuant to Ralphs personnel policies and provision II.A.3. of the General Permit Fact Sheet information regarding individual employee names are deemed to be confidential.

1 Waterkeeper that the foregoing has been uploaded to SMARTS
 2 and certified within ten (10) days of certification.

3 c. Review of SWPPP: For any SWPPP updates pursuant to
 4 Paragraphs 29.a. and 29.b., LA Waterkeeper shall have thirty (30)
 5 days upon notification that a SWPPP revision has been uploaded
 6 to SMARTS to provide Defendant with comments. LA
 7 Waterkeeper not providing written comments to the SWPPP
 8 within thirty (30) days shall constitute irrefutable evidence that
 9 LA Waterkeeper accepts all revisions to the SWPPP. Within thirty
 10 (30) days of receiving LA Waterkeeper's comments to the
 11 SWPPP, if any, Defendant shall consider each of the comments
 12 and proposed changes and either accept them or justify in writing
 13 why a change is not incorporated. The Settling Parties agree to
 14 work in good faith to resolve any disputes with respect to the
 15 SWPPP, and any remaining disputes will be resolved through
 16 timely initiation of the dispute resolution procedures in Section IV
 17 below. Following its incorporation of proposed modification or
 18 additions (if any) into each revised SWPPP, Defendant shall
 19 upload the revised SWPPP to SMARTS.

20 d. The revised SWPPP, and all communications between the Settling
 21 Parties related thereto, as described in this Paragraph 29 shall be
 22 deemed confidential. The Settling Parties shall not use such
 23 SWPPP or communications for any purpose other than as
 24 confidential and informational communications, or as necessary as
 25 evidence in any dispute resolution proceeding.

26 **E. COMPLIANCE MONITORING AND REPORTING**

27 30. Ralphs shall allow LA Waterkeeper one (1) virtual site inspection in the
 28 first calendar year following the Effective Date. After the first year, if Ralphs is

1 required to prepare an ARS under this Consent Decree, LA Waterkeeper shall be
 2 permitted to conduct one (1) virtual site inspection to inspect any newly implemented
 3 BMPs described in the ARS, provided that Ralphs shall allow only one (1) site
 4 inspection during each calendar year of this Consent Decree. All such site inspections
 5 shall be conducted virtually, unless agreed upon by the Settling Parties. Any virtual
 6 site inspection shall occur during normal business hours at a time mutually agreed
 7 upon by the parties. LA Waterkeeper will provide Ralphs with at least twenty-four
 8 (24) hours' notice prior to any proposed virtual site inspection in anticipation of wet
 9 weather, and seventy-two (72) hours' notice during dry weather. For any virtual site
 10 inspection requested to occur in wet weather, the Settling Parties shall meet and
 11 confer during normal business hours regarding any adjustment in the timing which
 12 shall not be unreasonably denied in the event the forecast changes and anticipated
 13 precipitation appears unlikely or the need to allocate storm water team personnel to
 14 take required QSE samples as required hereunder, and thus frustrates the purpose of a
 15 virtual inspection in wet weather. If a virtual site inspection is infeasible due to
 16 sampling constraints described above, the Settling Parties shall consider alternative
 17 options during the meet and confer including but not limited to: (1) photo
 18 documenting the sampling event⁶; or (2) delaying the virtual site inspection until after
 19 the sampling activities have been completed. Notice will be provided by telephone
 20 and electronic mail to the individual(s) designated below at paragraph 57.

21 31. Reporting and Documents. During the life of this Consent Decree,
 22 Ralphs shall copy LA Waterkeeper on all non-privileged documents related to storm
 23 water quality at the Facility that Ralphs submits to or receives from the Regional
 24 Board, the State Board, and/or any State or local agency or municipality, which are
 25 not uploaded to SMARTS.

26
 27
 28 ⁶ Any photographs provided to LA Waterkeeper shall be deemed confidential. Ralphs shall not be required to upload the photographs to SMARTS. LA Waterkeeper shall not use the photographs for any purpose other than as a confidential and informational communication, or as necessary as evidence in any dispute resolution proceeding.

32. Consent Decree Monitoring. Ralphs agrees to partially defray costs associated with Plaintiff's monitoring of Defendant's compliance with this Consent Decree during the Term by paying by paying LA Waterkeeper the sum of Eighteen Thousand Dollars (\$18,000.00). Payment shall be made within thirty (30) days of the Entry Date. The payment shall be made via check, made payable to: "Los Angeles Waterkeeper" via certified mail, return receipt requested to Los Angeles Waterkeeper, c/o Barak Kamelgard, 360 E 2nd Street Suite 250, Los Angeles, CA 90012. Failure to submit payment as required under this Paragraph will constitute breach of the Consent Decree.

F. ENVIRONMENTAL MITIGATION, LITIGATION FEES AND COSTS, MISSED DEADLINES, AND INTEREST

33. Environmental Mitigation Project: To fund environmental project activities that will reduce or mitigate the impacts of storm water pollution from industrial activities occurring waterways tributary to San Pedro Bay, Ralphs agrees to make a payment totaling Forty Thousand Dollars (\$40,000.00) to the City of Long Beach Municipal Urban Stormwater Treatment ("MUST") Program to allow the program to continue to plan and design for general expansion of the MUST program made within thirty (30) days of the Entry Date, payable to the City of Long Beach and sent via overnight mail to the Office of the City Manager, 411 West Ocean Boulevard, 10th Floor, Long Beach, CA 90802. Failure to submit payment as required under this Paragraph will constitute breach of the Consent Decree.

34. LA Waterkeeper's Fees and Costs: Ralphs agrees to pay a total of Seventy-Seven Thousand Dollars (\$77,000.00) to LA Waterkeeper to reimburse LA Waterkeeper's investigation fees and costs, expert/consultant fees and costs, attorneys' fees, and other costs incurred by investigating and filing the lawsuit and negotiating a resolution of this matter within thirty (30) days of the Entry Date. The payment shall be made payable to: Lozeau Drury LLP and delivered by overnight carrier to Lozeau Drury LLP, Attn: Rebecca Davis, 1939 Harrison St., Ste. 150,

1 Oakland, CA 94612. Failure to submit payment as required under this Paragraph will
2 constitute breach of the Consent Decree.

3 35. Missed Deadlines: If Ralphs fails to submit to LA Waterkeeper any
4 payment, document, report, or communication required by this Consent Decree,
5 Ralphs shall pay a stipulated payment of Five Hundred Dollars (\$500) provided,
6 however, LA Waterkeeper shall notify Ralphs of any such failure and Ralphs shall
7 have ten (10) days to cure the alleged violation in lieu of any stipulated payment or
8 submit the matter to the Dispute Resolution procedures set forth in Section IV herein.
9 Such stipulated payments shall be made by check payable to the City of Long Beach ,
10 and such funds shall be used for the sole purpose of funding environmentally
11 beneficial projects, as described in Paragraph 33. Payment shall be sent via overnight
12 mail to the Office of the City Manager, 411 West Ocean Boulevard, 10th Floor, Long
13 Beach, CA 90802. Ralphs agrees to make the stipulated payment within fourteen (14)
14 days after the resolution of the event that precipitated the stipulated payment liability.

15 **IV. DISPUTE RESOLUTION**

16 36. This Court shall retain jurisdiction over this matter for the Term for the
17 purposes of enforcing its terms and conditions, and adjudicating all disputes among
18 the Parties that may arise under the provisions of this Consent Decree. The Court
19 shall have the power to enforce this Consent Decree with all available legal and
20 equitable remedies, including contempt.

21 37. Meet and Confer. Either party to this Consent Decree may invoke the
22 dispute resolution procedures of this Section IV by notifying the other party in
23 writing of the matter(s) in dispute and of the disputing party's proposal for resolution.
24 The Settling Parties shall then meet and confer in good faith (either telephonically or
25 in person) within ten (10) days of the date of the notice to fully resolve the dispute no
26 later than thirty (30) calendar days from the date of the notice.

27 38. Settlement Conference. If the Settling Parties cannot resolve the dispute
28 within thirty (30) days of the meet and confer described in Paragraph 37, the Settling

1 Parties agree that the dispute may be submitted for formal resolution by filing a
 2 motion before the United States District Court for the Central District of California.
 3 The Settling Parties agree to request an expedited hearing schedule on the motion.

4 39. In resolving any dispute arising from this Consent Decree before the
 5 Court, the prevailing Party shall be entitled to seek fees and costs incurred pursuant to
 6 the provisions set forth in Section 505(d) of the Clean Water Act, 33 U.S.C. §
 7 1365(d), and applicable case law interpreting such provisions, or as otherwise
 8 provided for by statute and/or case law.

9 **V. MUTUAL RELEASE OF LIABILITY AND COVENANT NOT TO SUE**

10 40. Plaintiff's Waiver and Release of Ralphs. Upon the Effective Date of
 11 this Consent Decree, Plaintiff, on its own behalf and on behalf of its officers and
 12 directors, releases Ralphs, its officers, directors, managers, employees, members,
 13 parents, subsidiaries, divisions, affiliates, successors or assigns, agents, attorneys and
 14 other representatives, from and waives all claims that were or could have been raised
 15 in the 60-Day Notice and/or the Complaint up to and including the Termination Date
 16 of this Consent Decree.

17 41. Ralphs's Waiver and Release of Plaintiff. Upon the Effective Date of
 18 this Consent Decree, Ralphs, on its own behalf and on behalf of its officers, directors,
 19 employees, parents, subsidiaries, affiliates and each of their successors or assigns,
 20 releases Plaintiff, its officers and directors, from and waives all claims related to the
 21 60-Day Notice and/or the Complaint up to and including the Termination Date of this
 22 Consent Decree.

23 42. Nothing in this Consent Decree limits or otherwise affects Plaintiff's
 24 rights to address or take any position that it deems necessary or appropriate in an
 25 informal or formal proceeding before the State Board, Regional Board, EPA, or any
 26 other judicial or administrative body (other than a proceeding instituted by Plaintiff)
 27 on any matter relating to Ralphs' compliance at the Facility with the General Permit
 28 or the Clean Water Act occurring or arising after the Effective Date.

1 **VI. MISCELLANEOUS PROVISIONS**

2 43. No Admission of Liability. The Settling Parties enter this Consent
3 Decree for the purpose of avoiding prolonged and costly litigation. Neither the
4 Consent Decree nor any payment pursuant to the Consent Decree shall constitute or
5 be construed as a finding, adjudication, or acknowledgement of any fact, law, or
6 liability, nor shall it be construed as an admission of violation of any law, rule, or
7 regulation. Ralphs maintains and reserves all defenses it may have to any alleged
8 violations that may be raised in the future.

9 44. Counterparts. This Consent Decree may be executed in any number of
10 counterparts, all of which together shall constitute one original document. Telecopy
11 and/or facsimile copies of original signature shall be deemed to be originally
12 executed counterparts of this Consent Decree.

13 45. Authority. The undersigned representatives for Plaintiff and Ralphs each
14 certify that s/he is fully authorized by the party whom s/he represents to enter into
15 this Consent Decree. A Settling Party's signature to this Consent Decree transmitted
16 by facsimile or electronic mail shall be deemed binding.

17 46. Construction. The language in all parts of this Consent Decree shall be
18 construed according to its plain and ordinary meaning, except as to those terms
19 defined in the General Permit, the Clean Water Act, or specifically herein. The
20 captions and paragraph headings used in this Consent Decree are for reference only
21 and shall not affect the construction of this Consent Decree.

22 47. Full Settlement. This Consent Decree constitutes a full and final
23 settlement of this matter.

24 48. Integration Clause. This is an integrated Consent Decree. This Consent
25 Decree is intended to be a full and complete statement of the terms of the agreement
26 between the Settling Parties and expressly supersedes all prior oral or written
27 agreements, covenants, representations, and warranties (express or implied)
28 concerning the subject matter of this Consent Decree.

1 49. Severability. If any provision, paragraph, section, or sentence of this
2 Consent Decree is held by a court to be unenforceable, the validity of the enforceable
3 provisions shall not be adversely affected.

4 50. Choice of Law. The laws of the United States shall govern this Consent
5 Decree.

6 51. Diligence: Ralphs shall, in good faith, diligently file and pursue all
7 required permit applications for any required BMPs and shall diligently procure
8 contractors, labor, and materials needed to complete all BMPs by the required
9 deadlines.

10 52. Effect of Consent Decree: As between the Settling Parties, compliance
11 with this Agreement shall constitute substantial evidence that Ralphs is complying
12 with the provisions of the General Permit referenced herein.

13 53. Negotiated Settlement. The Settling Parties have negotiated this Consent
14 Decree and agree that it shall not be construed against the party preparing it but shall
15 be construed as if the Settling Parties jointly prepared this Consent Decree, and any
16 uncertainty and ambiguity shall not be interpreted against any one party.

17 54. Modification of the Consent Decree. This Consent Decree, and any
18 provisions herein, may not be changed, waived, discharged, or terminated unless by a
19 written instrument, signed by the Settling Parties and approved by the Court. Any
20 request to modify any provision of the Consent Decree, including but not limited to
21 any deadline(s) set forth herein, must be made in writing at least fourteen (14) days
22 before the existing deadline(s) applicable to the provision(s) proposed to be modified.

23 55. Assignment. Subject only to the express restrictions contained in this
24 Consent Decree, all the rights, duties and obligations contained in this Consent
25 Decree shall inure to the benefit of and be binding upon the Settling Parties, and their
26 successors and assigns, provide however that this provision shall not conflict,
27 preempt or waive Ralphs' rights to terminate this agreement pursuant to paragraph
28 11.p.ii. Ralphs shall notify Plaintiff within ten (10) days of any assignment.

56. Force Majeure. Neither of the Settling Parties shall be in default in the performance of any of their respective obligations under this Consent Decree when performance becomes impossible due to a Force Majeure event. A Force Majeure event is any circumstance beyond a Settling Party's control, including without limitation, any act of God, war, fire, earthquake, flood, windstorm, pandemic, public health crisis, or natural catastrophe; criminal acts; civil disturbance, vandalism, sabotage, or terrorism; restraint by court order or public authority or agency; or action or non-action by, or inability to obtain the necessary authorizations or approvals from any governmental agency. A Force Majeure event shall not include normal inclement weather, economic hardship, inability to pay, or employee negligence. Any party seeking to rely upon this Paragraph to excuse or postpone performance shall have the burden of establishing that it could not reasonably have been expected to avoid the Force Majeure event and which by exercise of due diligence has been unable to overcome the failure of performance. The Settling Parties shall exercise due diligence to resolve and remove any Force Majeure event.

57. Correspondence. All notices required herein or any other correspondence pertaining to this Consent Decree shall be, the extent feasible, sent via electronic mail transmission to the e-mail address listed below, or if electronic mail is not feasible, then by certified U.S. mail with return receipt, or by hand delivery to the following addresses:

If to Plaintiff:

Los Angeles Waterkeeper
Barak Kamelgard
Benjamin Harris
Madeleine Siegel
360 E 2nd St., Suite 250
Los Angeles, CA 90012
Email: barak@lawaterkeeper.org
Email: ben@lawaterkeeper.org
Email: madeleine@lawaterkeeper.org
Phone: (310) 394-6162

If to Ralphs:

Maria Zambrano-Lozano
Environmental Manager
Ralphs Grocery Company
2201 S. Wilmington Ave
Compton, CA 90220
Maria.zambano-lozano@kroger.com

With copies to:

Rebecca Davis
 LOZEAU DRURY LLP
 1939 Harrison St., Suite 150
 Oakland, CA 94612
 rebecca@lozeaudrury.com
 Phone: (510) 836-4200

With copies to:

John DeFrance, Esq.
 Senior Attorney
 The Kroger Co.
 1100 W. Artesia Blvd.
 Compton, CA 90220
 E: john.defrance@ralphs.com

and

Environmental Law Group LLP
 Attn: S. Wayne Rosenbaum
 225 Broadway, Suite 1900
 San Diego, CA 92101
 swr@envirolawyer.com

Notifications of communications shall be deemed submitted three (3) days after the date that they are postmarked and sent by first-class mail, or immediately after acknowledgement of receipt via email by the receiving party. Any change of address or addresses shall be communicated in the manner described above for giving notices.


58. If for any reason the Federal Agencies should object to entry of this Consent Decree or to any portion of this Consent Decree or the District Court should decline to approve this Consent Decree in the form presented, the Settling Parties shall use their best efforts to work together to modify the Consent Decree within thirty (30) days so that it is acceptable to the Federal Agencies or the District Court, as applicable. If the Settling Parties are unable to modify this Consent Decree in a mutually acceptable manner that is also acceptable to the District Court, this Consent Decree shall immediately be null and void as well as inadmissible as a settlement communication under Federal Rule of Evidence 408 and California Evidence Code section 1152.

1 The Settling Parties hereto enter this Consent Decree and submit it to the Court
2 for its approval and entry as a final judgment.


3 IN WITNESS WHEREOF, the undersigned have executed this Consent Decree
4 as of the date first set forth below.

5
6 APPROVED AS TO CONTENT

7
8
9 Dated: April 18, 2024

By: 
Bruce Reznik
Executive Director
Los Angeles Waterkeeper

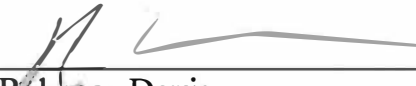
10
11
12 Dated: April 18, 2024

By: 
John DeFrance, Esq.
Senior Attorney
The Kroger Co.

13
14
15
16 APPROVED AS TO FORM


17
18 LOZEAU DRURY LLP

19
20 Dated: April 18, 2024

By: 
Rebecca Davis
Attorney for Plaintiff
Los Angeles Waterkeeper

21
22
23
24 ENVIRONMENTAL LAW GROUP LLP

25
26 Dated: April 18, 2024

By: 
S. Wayne Rosenbaum
Attorney for Ralphs
Ralphs Grocery Company

1 **IT IS SO ORDERED.**
2 **FINAL JUDGMENT**

3 Upon approval and entry of this Consent Decree by the Court, this Consent
4 Decree shall constitute a final judgment between the Plaintiff and Ralphs.
5
6

7 Dated: June 5, 2024

CENTRAL DISTRICT OF CALIFORNIA

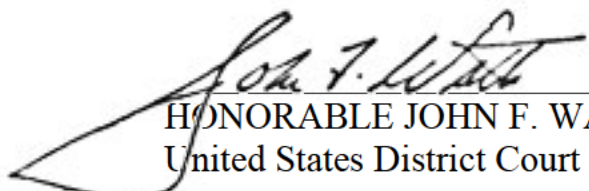
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10 
11 HONORABLE JOHN F. WALTER
12 United States District Court Judge
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EXHIBIT A

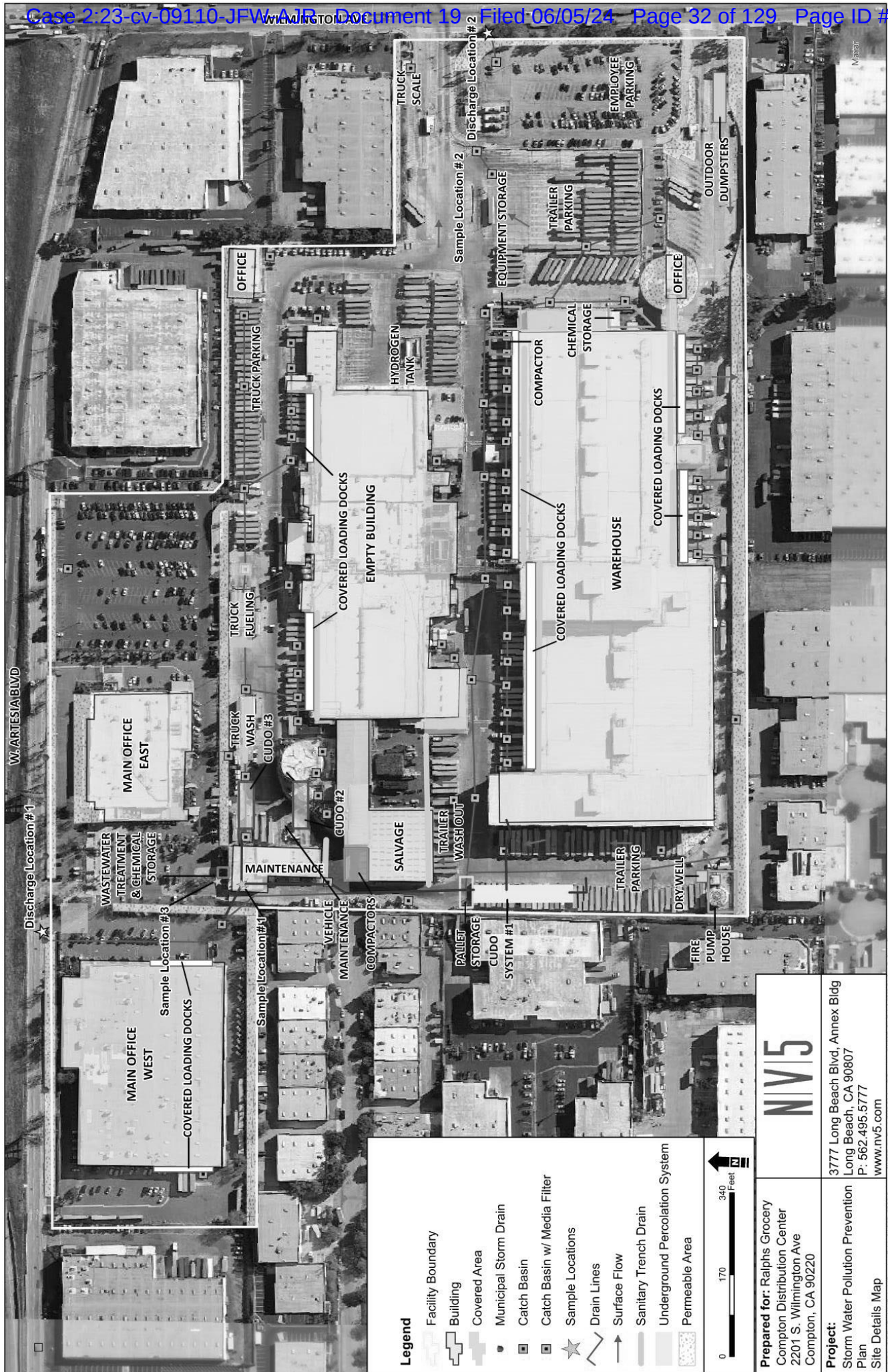
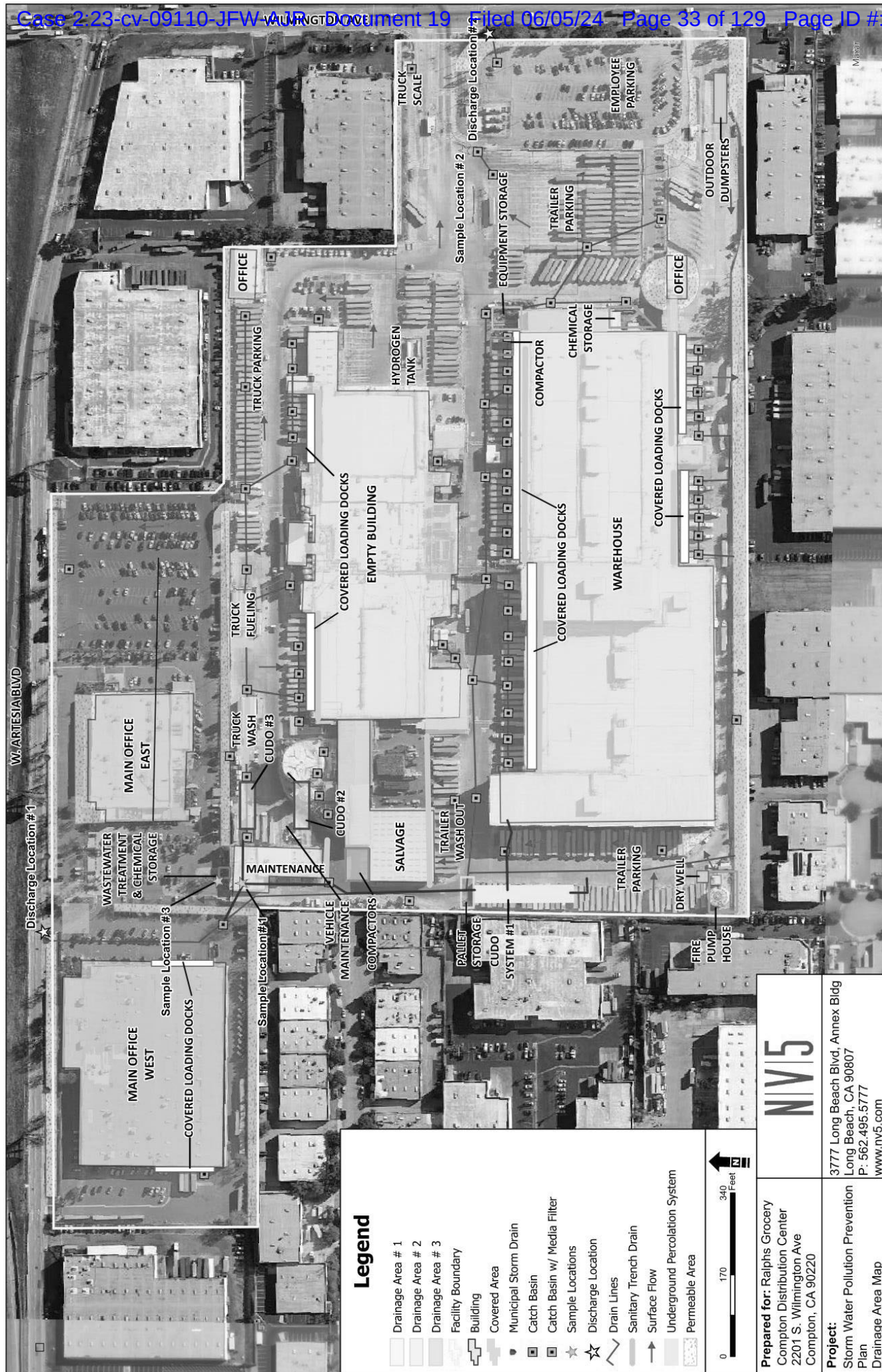


Figure A-3. Facility Location Showing Site Features, Drainage Lines, and Sample Locations



<p>Prepared for: Ralphs Grocery Compton Distribution Center 2201 S. Wilmington Ave Compton, CA 90220</p>	<p>Project: Storm Water Pollution Prevention Plan Drainage Area Map</p>
<p>NIV5</p>	<p>3777 Long Beach Blvd, Annex Bldg Long Beach, CA 90807 P: 562.495.5777 www.niv5.com</p>

Figure A-4. Facility Location Showing Drainage Areas, Site Features, and Sample Locations

EXHIBIT B

CONFIDENTIAL – NOT FOR DISTRIBUTION

Analyte Reduction Strategy Report

Qualifying Storm Event Sample Date(s): _____

Date(s) Sample Analyses Received: _____

Constituent	TSS (mg/L)	O&G (mg/L)	pH (s.u.)	Copper (mg/L)	Lead (mg/L)	Zinc (mg/L)	N+N
Numeric Limit	100 (annual); 400 (instant)	15 (annual); 25 (instant)	6.5-8.5 (instant)	0.0332 (annual); 0.06749 (instant)	0.094 (instant)	0.159 (instant)	0.68 (annual); 8.0 (instant)
[SAMPLING LOCATION]	[Result]	[Result]	[Result]	[Result]	[Result]	[Result]	[Result]
Likely Source(s) of Excess Contamination							
[SAMPLING LOCATION]	[Result]	[Result]	[Result]	[Result]	[Result]	[Result]	[Result]
Likely Source(s) of Excess Contamination							

Sampling Location	Additional BMPs Planned	Estimated Date of Implementation	Los Angeles Waterkeeper Comments if any (attach additional pages if necessary)	Response to Comments if any (attach additional pages if necessary)

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Date Sent to Los Angeles Waterkeeper: _____

Preparer: _____

QISP ID Number: _____

Date Comments Received (no later than 30 days from LAW receipt of report):

Los Angeles Waterkeeper comments received by: _____

Date Response to comments sent to Waterkeeper: _____.

Preparer: _____

QISP ID Number: _____

EXHIBIT C

**STORMWATER POLLUTION PREVENTION PLAN
FOR
RALPHS – COMPTON DISTRIBUTION CENTER
COMPTON, CA**



Waste Discharge Identification (WDID):

4 19I000841

March 2019

(Revised April 3, 2024)

N | V | 5

STORMWATER POLLUTION PREVENTION PLAN
FOR
RALPHS – COMPTON DISTRIBUTION CENTER
COMPTON, CA



Prepared for:

Ralphs, Inc. – Compton Distribution Center
2201 S. Wilmington Avenue
Compton, California 90220

Prepared by:

Alta Environmental
3777 Long Beach Blvd., Annex Bldg.
Long Beach, CA 90807

March 2019

(Revised April 3, 2024)

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- Appendix H – BMP Implementation Log
- Appendix I – Industrial General Permit
- Appendix K – Hazardous Materials Inventory

Legally Responsible Person

Approval and Certification of the Stormwater Pollution Prevention Plan

Facility Name: Ralphs, Inc. – Compton Distribution Center

Waste Discharge Identification
(WDID): 4 19I000841

"I certify under penalty of law that this document and all Attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Maria Zambrano-Lozano

Legally Responsible Person

Signature of Legally Responsible Person or Approved Signatory

Maria Zambrano-Lozano

Name of Legally Responsible Person or Approved Signatory

Date _____

(310) 884-4016

Telephone Number

**Ralphs Compton Distribution Center
Storm Water Pollution Prevention Plan**

NV5

Amendment Log

Facility Name:

Ralphs, Inc. – Compton Distribution Center

Waste Discharge Identification
(WDID):

4 19I000841

Amendment No.	Date	Page and Section No.	Requested By	Brief Description of Amendment; include reason for change, site location, and BMP modifications.	Prepared and Approved By
1	7/14/2022	Entire Document	Austin Kay/Maria Zambrano-Lozano/Regional Board	Inclusion of Copper, Zinc, and Lead due to revision of pollutant source assessment. Update of Site Maps, Facility information, and Facility contacts. Minor editorial edits throughout.	Austin Kay/Maria Zambrano-Lozano
2	7/21/2022	Section 2.1.1, Section 2.3.1, Table 4-1, Table 5-5, Table 5-6, Example COC	Austin Kay/Maria Zambrano-Lozano/Regional Board	Inclusion of Nitrate as N, Nitrite as N, and Nitrate+Nitrite as N as sampling parameters due to revision of pollutant source assessment and adopted TMDLs. Update of person responsible for BMP implementation.	Austin Kay/Maria Zambrano-Lozano
3	6/26/23	Sections 1.1, 2.1.1, 2.1.2, 2.1.3, 2.1.4, 2.2, 2.3.1, 5.3.1, 5.5.5, 5.6.2, Tables 2-1, 3-5, 4-1, 5-1, MIP Attachment 3, Appendices A, E, H, I, J, K	Austin Kay/Maria Zambrano-Lozano	SIC code update, update of industrial activity areas exposed to stormwater, update of discharge and sampling locations, update of BMP summary and implementation tables, inclusion of representative sampling reduction, update of example forms, Site Map updates.	Austin Kay/Maria Zambrano-Lozano

**Ralphs Compton Distribution Center
Storm Water Pollution Prevention Plan**

NV5

Amendment No.	Date	Page and Section No.	Requested By	Brief Description of Amendment; include reason for change, site location, and BMP modifications.	Prepared and Approved By
4	12/29/2023	Entire Document	Austin Kay/Maria Zambrano-Lozano	Revision to remove SWPPP version 3 updates due to COI denial by RWQCB, inclusion of Level 1 status update and BMP modifications based on Level 1 ERA process, update of Sample Location #3 to accurately characterize industrial discharge.	Austin Kay/Maria Zambrano-Lozano
5	4/03/2024	Sections 1.1, 1.4, 3.1.6, 3.2.1, 4.2, 5.5.1, 5.5.2	Maria Zambrano-Lozano	Revision to SWPPP language regarding training procedures, pollution prevention team members, exposure minimization BMPs, BMP inspection and maintenance, visual observation procedures, and addition of SIC code.	Katlin Goodrich/ Dave Renfrew/ Maria Zambrano-Lozano

1.0 SWPPP REQUIREMENTS

1.1 INTRODUCTION

The Ralphs, Inc. – Compton Distribution Center site comprises approximately 72 acres and is located at 2201 S. Wilmington Avenue in Compton, California. The property is owned and operated by Ralphs, Inc. Ralphs, Inc. is an establishment primarily engaged in furnishing “over-the-road” trucking services or trucking services and storage services (SIC Code 4213). The facility location is shown on the Site Maps in Appendix A.

This Stormwater Pollution Prevention Plan (SWPPP) is designed to comply with California’s General Permit for Stormwater Discharges Associated with Industrial Activities (General Permit) Order No. 2014-0057-DWQ (NPDES No. CAS000001) issued by the State Water Resources Control Board (State Water Board). This SWPPP has been prepared based on the SWPPP Template provided on the California Stormwater Quality Association Stormwater *Best Management Practice Handbook Portal: Industrial and Commercial* (CASQA 2014). In accordance with the General Permit, Section X.A, this SWPPP contains the following required elements:

- Facility Name and Contact Information;
- Site Map;
- List of Significant Industrial Materials;
- Description of Potential Pollution Sources;
- Assessment of Potential Pollutant Sources;
- Minimum BMPs;
- Advanced BMPs, if applicable;
- Monitoring Implementation Plan (MIP);
- Annual Comprehensive Facility Compliance Evaluation (Annual Evaluation); and,
- Date that SWPPP was Initially Prepared and the Date of Each SWPPP Amendment, if Applicable.

1.2 PERMIT REGISTRATION DOCUMENTS

Required Permit Registration Documents (PRDs) were submitted to the State Water Board via the Stormwater Multi Application and Report Tracking System (SMARTS) by the Legally Responsible Person (LRP), or authorized personnel (i.e., Approved Signatory) under the direction of the LRP. The project-specific PRDs include:

1. Notice of Intent (NOI);
2. Signed Certification Statement (LRP Certification is provided electronically with SMARTS PRD submittal);
3. Site Maps;
4. SWPPP; and

5. Annual Fee.

- The Site Maps can be found in Appendix A. A copy of the submitted PRDs are also kept in Appendix B of the SWPPP along with the Waste Discharge Identification (WDID) confirmation.
- The SWPPP uploaded into SMARTS should not include a copy of the General Permit.
- In the event of future significant changes to the facility layout, the Discharger will certify and submit new PRDs via SMARTS.

1.3 SWPPP AVAILABILITY AND IMPLEMENTATION

The SWPPP is available on-site to all employees during all hours of operation (see Section 2.2 for the Operations Schedule), and will be made available upon request by a State or Municipal inspector. The SWPPP will be implemented by July 1, 2015.

1.4 POLLUTION PREVENTION TEAM

Facility staff that have been designated as Pollution Prevention Team members are listed below in Table 1-1, along with their responsibilities and duties. A list of alternate team members is also provided, and these personnel will perform SWPPP activities when regular members of the Pollution Prevention Team are absent or unavailable. This table will be updated as needed when there are changes to staff and staff responsibilities. All team members will be trained to perform the duties assigned to them. Employee training logs are provided in Appendix C.

QISPs identified for the project (when made available) are listed in Appendix D. The QISP will have primary responsibility for providing training to the appropriate team members assigned to perform the activities required in this SWPPP.

Table 1-1. Pollution Prevention Team

Team Member Title	Phone Number	Responsibilities and Duties
Regional Manager, Environmental Compliance, Southwest Region	(310) 884-4016	SWPPP implementation oversight, LRP
Maintenance Manager	(310) 884-6017	SWPPP implementation, visual monitoring, sampling, corrective actions
Maintenance/Chief Engineer	(310) 884-6031	SWPPP implementation, visual monitoring, sampling, corrective actions
Watch Assistant Chief	(310) 884-6021	Alternate: SWPPP implementation, visual monitoring, sampling, corrective actions

1.5 DULY AUTHORIZED REPRESENTATIVES

Duly Authorized Representatives who are responsible for SWPPP implementation and have authority to sign PRDs are listed below in Table 1-2. Written authorizations from the LRP for these individuals are provided in Appendix D.

Table 1-2. Duly Authorized Representatives

Name	Title	Phone Number

1.6 PERMITS AND GOVERNING DOCUMENTS

- Regional Water Board requirements;
- Basin Plan requirements;
- TMDL Requirements;
- Spill Prevention Control and Countermeasures Plan;
- Hazardous Material Business Plan;
- Hazardous Waste Regulations and Permits;
- Air Quality Regulations and Permits ; and
- Clean Water Act Section 401 Water Quality Certifications and 404 Permits.

1.7 SWPPP AMENDMENTS

This SWPPP will be amended or revised as needed. A list of amendments (Amendment Log) is included in the front of this SWPPP (page 7), and amendment certifications are included in Appendix E. The Amendment Log will include the date of initial preparation and the date of each amendment.

Amendments will be logged at the front of the SWPPP and certification kept in Appendix E. The SWPPP text will be revised replaced, and/or hand annotated as necessary to properly convey the amendment. SWPPP amendments must be certified and submitted by the LRP or their designated Duly Authorized Representative via SMARTS within 30 days whenever the SWPPP contains significant revisions. With the exception of significant revisions, SWPPP changes will be certified and uploaded to SMARTS once every three (3) months in the reporting year.

1.8 RETENTION OF RECORDS

Paper or electronic records of documents required by this SWPPP will be retained for a minimum of five (5) years from the date generated or date submitted, whichever is later, for the following items:

- Employee Training Records;

- BMP Implementation Records;
- Spill and Clean-up Related Records;
- Records of Sampling and Analysis Information
 - The date, exact location, and time of sampling or measurement;
 - The date(s) analyses were performed;
 - The individual(s) that performed the analyses;
 - The analytical techniques or methods used; and
 - The results of such analyses;
- Records of Visual Observations
 - The date
 - The industrial areas/drainage areas of the facility observed during the inspection (Location);
 - The approximate time of the observation;
 - Presence and probable source of observed pollutants; and
 - Name of the individual(s) that conducted the observations;
- Response to the observations including identification of SWPPP revisions if needed.
- Level 1 ERA Reports (if applicable);
- Level 2 ERA Action Plan (if applicable);
- Level 2 ERA Technical Report (if applicable); and
- Annual Reports from SMARTS (checklist and any explanations).

Copies of these records will be available for review by the Water Board's staff at the facility during scheduled facility operating hours. Upon written request by U.S. EPA or the local MS4, Dischargers will provide paper or electronic copies of requested records to the Water Boards, U.S. EPA, or local MS4 within ten (10) working days from receipt of the request.

1.9 EXCEEDANCE RESPONSE ACTIONS (ERAS)

If a General Permit NAL exceedance occurs in a given reporting year, a Level 1 ERA Evaluation and a Level 1 ERA Report will be required in the following year, or, if in a subsequent year, a Level 2 ERA Action Plan and a Level 2 ERA Report will be required in accordance with the General Permit. The results of either of the ERA reports may require that the SWPPP be amended.

1.10 ANNUAL COMPREHENSIVE FACILITY COMPLIANCE EVALUATION

The General Permit (Section XV) requires the Discharger to conduct one Annual Comprehensive Facility Compliance Evaluation (Annual Evaluation) for each reporting year (July 1 to June 30). Annual Evaluations will be conducted at least eight (8) months and not more than sixteen (16) months after the previous Annual Evaluation. The planned window for conducting the Annual Evaluation is between April and June of each year. The SWPPP will be revised, as appropriate based on the results of the Annual Evaluation, and the revisions will be implemented within 90 days of the Annual Evaluation.

At a minimum, Annual Evaluations will consist of:

- A review of all sampling, visual observation, and inspection and monitoring records and sampling and analysis results conducted during the previous reporting year;
- A visual inspection of all areas of industrial activity and associated potential pollutant sources for evidence of, or the potential for, pollutants entering the stormwater conveyance system;
- A visual inspection of all drainage areas previously identified as having no exposure to industrial activities and materials in accordance with the definitions in Section XVII;
- A visual inspection of equipment needed to implement the BMPs;
- A visual inspection of any BMPs;
- A review and effectiveness assessment of all BMPs for each area of industrial activity and associated potential pollutant sources to determine if the BMPs are properly designed, implemented, and are effective in reducing and preventing pollutants in industrial stormwater discharges and authorized NSWDS; and
- An assessment of any other factors needed to comply with the Annual Reporting requirements in General Permit Section XVI.B.

1.11 ANNUAL REPORT

The Annual Report will be prepared, certified, and electronically submitted no later than July 15th following each reporting year using the standardized format and checklists in SMARTS based on the reporting requirements identified in Section XVI of the General Permit. Annual reports will be submitted in SMARTS and in accordance with information required by the on-line forms.

1.12 TERMINATION AND CHANGES TO GENERAL PERMIT COVERAGE

When any of the following conditions occur, termination of coverage under the General Permit will be requested by certifying and submitting a Notice of Termination (NOT) via SMARTS:

- Operation of the facility has been transferred to another entity;
- The facility has ceased operations, completed closure activities, and removed all industrial related pollutant generating sources;
- The facility's operations have changed and are no longer subject to the General Permit.

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The SWPPP and all the provisions of the General Permit will be complied with until a valid NOT is received and accepted by the Board.

If ownership changes, the new owner of the facility will be notified of the General Permit and regulatory requirements for permit coverage.

2.0 FACILITY INFORMATION

2.1 FACILITY DESCRIPTION

2.1.1 Facility Location

The Ralphs, Inc. – Compton Distribution Center facility comprises approximately 72 acres and is located at 2201 S. Wilmington Avenue in Compton, California. The facility is located on the west side of Wilmington Avenue and the south side of Artesia Boulevard, directly south of the Gardena Freeway (Highway 91). The facility is in a primarily commercial/industrial area with land uses on the east, west and south comprising of primarily industrial operations, and is approximately 2.5 miles west of the Los Angeles River. The facility is located at 33.87168°N and -118.23591°W and is identified on the Site Maps in Appendix A.

The site is located approximately 2.5 miles west of the Los Angeles River (Los Angeles River – Los Angeles River Reach 1, Los Angeles River Reach 2, Compton Creek) which is listed for impairments on the Clean Water Act Section 303(d) List. The Los Angeles River has also adopted TMDLs for Metals and Nitrogen. The Los Angeles River Metals TMDLs and Los Angeles River Nitrogen TMDL will be applicable to the Ralphs Facility and have been considered in the Pollutant Source Assessment. Flows leave the Ralphs Facility through catch basins and drop inlets throughout the facility and are transported through an underground storm drain system to the local Municipal Separate Storm Sewer System (MS4). Flows combine with other discharges and flow East to Compton Creek, which discharges to the Los Angeles River. The Los Angeles River is listed for the following impairments:

- Ammonia
- Cyanide
- Diazinon
- Dissolved Oxygen
- Coliform Bacteria
- Cadmium
- Copper, Dissolved
- Zinc
- Copper
- Lead
- Nutrients
- Oil
- pH

2.1.2 Facility Operations

Operations at the Ralphs, Inc. – Compton Distribution Center facility consist of all activities required to distribute goods to local retail stores. A list of specific activities is provided below:

- Goods movement within the property
- Truck loading/unloading of goods
- Truck maintenance
- Truck fueling
- Truck washing
- Facility maintenance
- Equipment storage
- Waste handling/disposal
- Food waste processing
- Hazardous materials storage/handling

2.1.3 Existing Conditions

The facility site consists of six main buildings: The Main Warehouse, Empty Building, Salvage Building, Maintenance Garage, Main Office West and Main Office East. Of the developed area, approximately 36 acres of industrial activities are directly exposed to precipitation and stormwater runoff. Existing BMPs at this facility are described in Section 3.

The Main Warehouse is approximately 393,000 square feet and is located on the southern area of the site. Primarily, this building is used to store/load/unload packaged foods, drinks and household products. There is also a maintenance shop/area and equipment storage on the east side of the warehouse.

The empty building is in the middle area of the parcel to the north of the Main Warehouse and has an area of approximately 232,000 square feet. It was previously used to produce, process, package and store various dairy products, however these activities have been discontinued onsite as of January 2022. Additionally, there is a small office area, truck fueling area, truck wash, truck parking, equipment storage and chemical storage to the north of the empty building.

The Salvage Building is located just to the west of the Creamery and is approximately 40,000 square feet. This building is used to process salvageable materials such as food waste, wood pallets, plastics, boxes, cardboard bales and other items. There are trash compactors and a food waste processing area on the north side as well as pallet storage and a trailer wash on the south side of the building.

The Maintenance Garage is in the northwest corner of the upper campus, to the north of the Salvage Building and is approximately 13,500 square feet. Truck, vehicle and equipment maintenance activities occur within and around this building. The maintenance garage bays are contained to collect wash water or fluids in a trench drain that is routed to the sanitary sewer system. Additionally, there are various oil and waste oil tanks or drums that are fully contained and stored indoors.

The Main Office West building is approximately 133,300 square feet and is in the northwest corner of the facility.

The Main Office East building is approximately 53,000 square feet and is on the north side of the facility, east of the Main Office West and northeast of the Maintenance Garage. Wastewater treatment and chemical storage activities occur around this building.

There are no known historic sources of contamination at the site.

2.1.4 Description of Drainage Areas and Existing Drainage

The facility consists of three primary drainage areas that drain to the MS4, as shown on the Site Maps in Appendix A. The Site Maps show the area layout, including the general site topography, approximate storm drainage system, some drainage inlets, its respective drainage areas, and discharge locations.

The facility site is split into two relatively level parcels with a steep dividing area allowing travel between the warehousing areas and the main offices. The elevation of the project is approximately 140 feet above mean sea level (msl). Surface drainage at the site currently flows to the local MS4 through a network of storm drains, catch basins and pipes.

Detailed descriptions of all drainage areas are provided below.

Drainage Area 1 encompasses the vast majority of the property including the Main Warehouse, Creamery Building (non-operational), Salvage, and Maintenance buildings. Flows are collected through multiple drop inlets throughout the area and transferred to the MS4 off W Artesia Blvd. via underground drainage pipes. Industrial activities in this area include trucking, loading/unloading of goods, vehicle maintenance, vehicle fueling, truck washing, facility maintenance, equipment storage, hazardous materials storage/handling, and waste handling/disposal.

Drainage Area 2 encompasses the employee parking area and a portion of the truck parking area. Flows are collected in drop inlets and catch basins then transferred to the MS4 off S. Wilmington Ave. via underground drainage pipes. Industrial activities in this area include trucking.

Drainage Area 3 encompasses the Main Office East and West buildings and parking lot on the north side of the facility. Sheet flows are allowed to travel between the two office buildings and out of the facility boundary to the north into MS4 catch basins along W. Artesia Blvd. Industrial activities in this area include wastewater treatment and chemical storage.

A description of the industrial wastewater system is described below.

The separator/clarifier system located south of the garage at the bailer accepts wastewater generated from the covered dock area. The clarifier located at the east end of the warehouse building accepts wastewater from the new maintenance building. A scrubber dump sump is also located in this area and routes to the clarifier. The sand/oil separator servicing the truck wash facility is designed to contain all flows within the facility. The clarifier at the pH wastewater treatment system accepts from the entire western sewer conveyance system. The clarifier at the trailer wash out area accepts wastewater from this activity. It is connected to a diversion switch, which, when enabled in rainfall above 0.1", diverts the water to the storm drainage system. The clarifier at the dock accepts the water after the trailer wash out area clarifier, and routes it to the Artesia clarifier. The "lift station" clarifier located just east of the warehouse cafeteria stairs accepts wastewater from the dock doors and warehouse drains at the south and north side of the warehouse building and routes it to the dock clarifier.

2.1.5 Stormwater Run-On from Offsite Areas

There is run-on to this property from the facility directly south. Due to improper drainage and damaged diversionary structures on the neighboring property, storm water will run onto the Ralphs' facility during heavy rainfall. During such times, storm water run-on will carry erodible soil onto the impervious areas of the facility. To minimize erosion and prevent soil from entering its storm water drains, Ralphs implements BMPs described in Section 3.0. Further, Ralphs actively pursues its neighbor to repair its storm water drainage system(s) and otherwise mitigate the excessive run-on.

2.2 OPERATIONS SCHEDULE

The Compton DC facility operates 7 days a week 24 hours a day. Industrial activities during this time period consist of goods movement within the property, truck loading/unloading of goods, truck maintenance, truck fueling, truck washing, facility maintenance, waste handling/disposal, equipment storage, and chemical storage/handling. Variations in actual operating hours may occur as necessary.

This SWPPP will be implemented, and a copy made available to facility staff at all times. A copy will be available to regulatory agency personnel upon request.

If industrial activities are temporarily suspended for ten (10) or more consecutive calendar days during a reporting year, BMPs that are necessary to achieve compliance with this General Permit during the temporary suspension of the industrial activity will be identified and incorporated into the SWPPP.

2.3 POLLUTANT SOURCE ASSESSMENT

This section presents a list of industrial materials and potential pollutant sources at the Ralphs facility. It identifies specific pollutants associated with these sources and pollutant sources that are most susceptible to stormwater exposure. A summary of significant spill and leaks that have occurred onsite is also provided.

2.3.1 Description of Potential Pollutant Sources

Table 2-1 includes a list of industrial activities and associated materials that are anticipated to be used onsite. These activities and associated materials will or could potentially contribute pollutants to stormwater runoff.

Loading and Unloading of Liquids and Dry Bulk Materials

Loading and unloading occurs at the main warehouse and creamery. While the loading and unloading is focused on finished and packaged products there is always the possibility of package breakage and spills to occur. When spills occur BMPs will be implemented to prevent discharge to the storm drain system.

Materials and Fuels Storage

Throughout the facility, various oil drums and fuel reservoirs are switched out or filled on a periodic basis. These liquids are used by the repair and maintenance mechanics to complete maintenance activities on trucks, vehicles, and equipment. Other materials are used in

operational equipment, processing, treatment and cleaning throughout the site. Potential pollutants include oils, fuels, and liquid chemicals. BMPs are implemented to provide secondary containment where applicable and when spills occur BMPs will be implemented to prevent discharge to the storm drain system.

Truck and Equipment Management

While the truck wash, trailer wash and maintenance garage have trench drainage systems routing to the wastewater system, there is some potential stormwater runoff from these areas. Potential pollutants could be cleaning detergents, oil and grease and small amounts of metals. Truck fueling and maintenance as well as equipment storage and maintenance operations pose the potential for stormwater runoff, with potential pollutants including oil and grease, fuels, and metals. Chemical storage areas contain potential pollutants described in Table 2-2. BMPs are implemented to provide secondary containment where applicable and when spills occur BMPs will be implemented to prevent discharge to the storm drain system.

Waste and Disposal

The Compton DC manages the following waste streams with the potential to pollute stormwater:

- There are three compactor areas (1) the southern Salvage compactor area (2) the northern Salvage compactor area and (3) the Main Warehouse compactor area. Containers with liquids are typically drained prior to compaction.
- Hazardous waste is stored for shipping off site at various locations throughout the facility. This material is managed in a way that is consistent with federal, state and local regulations and is disposed of when necessary.
- Oil/Water Separators are pumped out by the maintenance department when required. The waste is disposed of properly either by Ralphs staff or an outside removal company.
- Truck Shop trench drains are pumped out and disposed of off-site when necessary.
- Used waste oil is collected at the Maintenance Garage in a 480-gallon aboveground storage tank. When necessary, it is pumped out and transported off-site.

The anticipated activities and associated pollutants provided in Table 2-1 are the basis for selecting the BMPs for the facility as described in Section 3. Locations of industrial activities, storage areas, and associated BMPs are shown on the Site Maps in Appendix A. Chemical inventory is provided from CERS report in Appendix K.

Due to the vehicle maintenance and washing, equipment storage, and waste handling activities performed at the Ralphs Facility, there is a potential for pollutants associated with adopted TMDLs to be exposed to stormwater. Copper, Lead, Zinc, Nitrate as N, Nitrite as N, and Nitrate+Nitrite as N are potential pollutants within the Facility's industrial stormwater discharge with adopted TMDLs within the receiving water body and have been added to the sampling parameters for stormwater sampling during QSEs.

Table 2-1. Industrial Activities and Associated Materials

Industrial Activity	Associated Industrial Materials	Material Quantity	Material Physical Characteristics	Material Location	Associated Pollutants	Stormwater Exposure Pathway
Loading and Unloading Product	Misc. Material, Debris	See Appendix K	Liquids and Solids	Grocery Warehouse, Salvage	Misc. Material, Debris	Exposure to rain events and potential spills
Product Storage	Misc. Material, Debris, Organic Material, Oil and Grease, Diesel Fuel	See Appendix K	Liquids and Solids	Warehouses, General Area	Misc. Material, Debris, Organic Material, Oil and Grease, Diesel Fuel	Exposure to rain events and potential spills
Compactors	Misc. Material, Debris, Organic Material	See Appendix K	Liquids and Solids	Salvage	Misc. Material, Debris, Organic Material, Nitrate, Nitrite	Exposure to rain events and potential spills
Truck Maintenance	Oil and Grease, Antifreeze, Degreasers, Solids, Metals	See Appendix K	Liquids and Solids	Truck Shop	Oil and Grease, Antifreeze, Degreasers, Solids, Metals	Exposure to rain events and potential spills
Oil Water Separators	Organic Material, Oil and Grease	See Appendix K	Liquids and Solids	General Area	Organic Material, Oil and Grease	Exposure to rain events and potential spills
Truck Washing	Industrial Detergents, Cleaning Materials, Oil and Grease, Metals, Solids	See Appendix K	Liquids and Solids	Truck Wash	Industrial Detergents, Cleaning Materials, Oil and Grease, Metals, Solids	Exposure to rain events and potential spills

Table 2-1. Industrial Activities and Associated Materials

Industrial Activity	Associated Industrial Materials	Material Quantity	Material Physical Characteristics	Material Location	Associated Pollutants	Stormwater Exposure Pathway
Truck Fueling	Diesel Fuel, Oil and Grease	See Appendix K	Liquids	Truck Fueling and Trailer Fueling	Diesel Fuel, Oil and Grease	Exposure to rain events and potential spills
Hazardous Material Storage and Handling	See Table 2-2	See Appendix K	Liquids and Solids	Hazardous Material Storage Areas	See Table 2-2	Exposure to rain events and potential spills
Equipment Storage	Misc. Material, Debris, Oil and Grease, Diesel Fuel, Metals	See Appendix K	Liquids and Solids	Equipment Storage Areas	Misc. Material, Debris, Oil and Grease, Diesel Fuel, Metals	Exposure to rain events and potential spills
Waste Handling/Disposal	Misc. Material, Debris, Metals	See Appendix K	Liquids and Solids	Dumpster Areas	Misc. Material, Debris, Metals, Nitrate, Nitrite	Exposure to rain events and potential spills
Facilities Maintenance	Misc Metals, lubricants, oil and grease	See Appendix K	Liquids and Solids	Facilities Maintenance	Misc Metals, lubricants, oil and grease	Exposure to rain events and potential spills

2.3.2 Significant Spills and Leaks

The facility experienced a diesel spill of 100 gallons in August 2022 due to a vehicle collision within the main driveway of the facility. No discharge of diesel occurred, and cleanup of the spill was quick and comprehensive. Local CUPA was onsite to observe the spill and cleanup.

If spills occur during the implementation of this plan, provide a detailed description of significant spills or leaks including the following: the location, characteristics, and approximate quantity of the materials spilled or leaked; approximate quantity of the materials discharged from the facility's storm water conveyance system; the cleanup or remedial actions that have occurred or are planned; the approximate remaining quantity of materials that have the potential to be discharged; and the preventive measures taken to ensure spills or leaks of the material do not reoccur. The information is summarized in in Table 2-2.

Table 2-2. Spills and Leaks within Previous Five-Year Period

Industrial Material	Material Physical Characteristics	Location of Spill or Leak	Quantity Spilled or Leaked	Quantity Discharged from Site	Remaining Quantity with Potential for Discharge
Diesel	Liquid	Main Driveway	100 gallons	0 gallons	0 gallons

2.4 IDENTIFICATION OF NON-STORMWATER DISCHARGES (NSWDS)

Non-stormwater discharges (NSWDs) consist of discharges which do not originate from precipitation events. The General Permit provides allowances for specified NSWDS provided they:

- Do not cause erosion;
- Do not carry other pollutants;
- Are not prohibited by the local MS4; and
- Do not require a separate NPDES Permit from the Regional Water Board.

NSWDs into storm drainage systems or waterways, which are not authorized under the General Permit and listed in the SWPPP, or authorized under a separate NPDES permit, are prohibited.

Non-stormwater discharges that are authorized at this facility include the following:

- Lawn irrigation
- A/C condensate
- Potable water sources
- Fire system testing water

These authorized NSWDS will be managed with the stormwater and non-stormwater BMPs described in Section 3 of this SWPPP. These BMPs are implemented to:

- Reduce or prevent the contact of authorized NSWDS with materials or equipment that are potential sources of pollutants;
- Reduce, to the extent practicable, the flow or volume of authorized NSWDS;
- Ensure that authorized NSWDS do not contain quantities of pollutants that cause or contribute to an exceedance of a water quality standards; and
- Reduce or prevent discharges of pollutants in authorized NSWDS in a manner that reflects best industry practice considering technological availability and economic practicability and achievability.

Pollution prevention team members will be trained to identify NSWDS as described in General Permit Sections III and IV. Monthly visual observations will be conducted according to the General Permit (Section XI.A.1) for NSWDS and sources to ensure adequate BMP implementation and effectiveness. Monthly visual observations include observations for evidence of unauthorized NSWDS.

Steps will be taken, including the implementation of appropriate BMPs as defined in Section 3.0, to ensure that unauthorized NSWDS are eliminated, controlled, disposed off-site, or treated on-site.

2.5 REQUIRED SITE MAPS INFORMATION

The facility's Site Maps are provided in Appendix A, and include(s) all information required by the General Permit. The maps include information regarding the facility boundary and stormwater drainage areas, nearby water bodies, locations of stormwater collection and conveyance systems including outfalls, locations and descriptions of industrial activities and materials, and locations and descriptions of structural control measures.

A summary of information provided in the Site Maps is provided in Table 2-3 below.

Table 2-3. Required Site Maps Information Checklist

Included on Site Maps? Yes/No/ NA	Required Element
Yes	The facility boundary
Yes	Stormwater drainage areas within the facility boundary
Yes	Portions of any drainage area impacted by discharges from surrounding areas
Yes	Flow direction of each drainage area
NA	On-facility surface water bodies
Yes	Areas of soil erosion

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Table 2-3. Required Site Maps Information Checklist

Included on Site Maps? Yes/No/ NA	Required Element
Yes	Location(s) of nearby water bodies (such as rivers, lakes, wetlands, etc.)
Yes	Location(s) of municipal storm drain inlets that may receive the facility's industrial stormwater discharges and authorized NSWDS
Yes	Locations of stormwater collection and conveyance systems and associated points of discharge, and direction of flow
Yes	Any structural control measures (that affect industrial stormwater discharges, authorized NSWDS, and run-on)
Yes	All impervious areas of the facility, including paved areas, buildings, covered storage areas, or other roofed structures
Yes	Locations where materials are directly exposed to precipitation
NA	Locations where significant spills or leaks (Section X.G.1.d of the General Permit) have occurred
Yes	Areas of industrial activity subject to the General Permit
Yes	All storage areas and storage tanks
Yes	Shipping and receiving areas
Yes	Fueling areas
Yes	Vehicle and equipment storage/maintenance areas
Yes	Material handling and processing areas
Yes	Waste treatment and disposal areas
NA	Dust or particulate generating areas
Yes	Cleaning and material reuse areas
Yes	Any other areas of industrial activity which may have potential pollutant sources

3.0 BEST MANAGEMENT PRACTICES

3.1 MINIMUM BMPS

All minimum BMPs that are required by the General Permit and necessary to meet the facility conditions will be implemented. Guidance for BMP implementation is provided in the CASQA Stormwater BMP Handbook Portal: Industrial and Commercial Fact Sheets and the relevant fact sheets are included in Appendix G. Sections 3.1.1 through 3.1.5 list the requirements for each of these minimum BMPs. Minimum BMPs will be implemented for additional targeted industrial activities, equipment, and materials as necessary. If any of the required minimum BMPs are applicable but cannot be implemented, an explanation and alternative approach will be provided in the following sections.

Table 3-1 provides a list of the five minimum General Permit BMP elements that are included in the relevant BMP fact sheets and indicates which BMPs are implemented at the facility.

Employee Training, described in Section 3.1.6, and Quality Assurance and Record Keeping, described in Section 3.1.7, are additional minimum BMPs that will be implemented.

As required by the General Permit, a summary of implemented BMPs is included in Section 3.3. The schedule for BMP implementation and the requirements for inspection and maintenance are contained in Section 4.

Table 3-1. Minimum BMPs

CASQA Fact Sheet Number	CASQA BMP Fact Sheet Name	Addresses Minimum General Permit BMP Requirements					BMP to be Implemented?		
		Good Housekeeping	Preventative Maintenance	Spill and Leak Prevention and Response	Material Handling and Waste Management	Erosion and Sediment Control	YES	NO	Not Applicable
SC-10	Non-Stormwater Discharges	✓		✓			✓		
SC-11	Spill Prevention, Control, and Cleanup			✓			✓		
SC-20	Vehicle and Equipment Fueling	✓	✓	✓	✓		✓		
SC-21	Vehicle and Equipment Cleaning	✓	✓	✓	✓		✓		
SC-22	Vehicle and Equipment Maintenance and Repair	✓	✓	✓	✓		✓		
SC-30	Outdoor Loading and Unloading	✓		✓	✓		✓		
SC-31	Outdoor Liquid Container Storage	✓	✓	✓	✓		✓		
SC-32	Outdoor Equipment Operations	✓	✓	✓	✓		✓		
SC-33	Outdoor Storage of Raw Materials	✓	✓	✓		✓	✓		
SC-34	Waste Handling and Disposal	✓	✓	✓	✓		✓		
SC-35	Safer Alternative Products						✓		
SC-40	Contaminated or Erodible Surfaces					✓	✓		
SC-41	Building and Grounds Maintenance	✓		✓	✓		✓		
SC-42	Building Repair, Remodeling, and Construction	✓		✓	✓	✓	✓		
SC-43	Parking Area Maintenance	✓	✓	✓			✓		
SC-44	Drainage System Maintenance	✓	✓	✓			✓		
Additional BMPs Implemented: REM Triton Drop Inlet Filters, CUDO infiltration systems									

3.1.1 Good Housekeeping

The following good housekeeping measures will be implemented in accordance with the General Permit (Section X.H.1.a):

- Observe all outdoor areas associated with industrial activity including stormwater discharge locations, drainage areas, conveyance systems, waste handling/disposal areas, and perimeter areas impacted by off-facility materials or stormwater run-on to determine housekeeping needs. Any identified debris, waste, spills, tracked materials, or leaked materials will be cleaned and disposed of properly;
- Minimize or prevent material tracking;
- Minimize dust generated from industrial materials or activities;
- Ensure that all facility areas impacted by rinse/wash waters are cleaned as soon as possible;
- Cover all stored industrial materials that can be readily mobilized by contact with stormwater;
- Contain all stored non-solid industrial materials or wastes (e.g., particulates, powders, shredded paper, etc.) that can be transported or dispersed via by the wind or contact with stormwater;
- Prevent disposal of any rinse/wash waters or industrial materials into the stormwater conveyance system;
- Minimize stormwater discharges from non-industrial areas (e.g., stormwater flows from employee parking area) that contact industrial areas of the facility; and
- Minimize authorized NSWDs from non-industrial areas (e.g., potable water, fire hydrant testing, etc.) that contact industrial areas of the facility.

BMPs to be implemented are summarized in Table 3.1 and the BMP fact sheets are included in Appendix G. Ralphs conducts daily sweeping in and around the warehouses. Additionally, the facility utilizes an outside porter that is scheduled from 5am to 1:30pm, Monday through Friday. During this time, maintenance of the entire facility is conducted, which includes utilizing a mechanical sweeper in accessible areas and sweeping by hand in hard-to-reach areas.

3.1.2 Preventative Maintenance

The following preventative maintenance measures will be implemented in accordance with the General Permit (Section X.H.1.b):

- Identify all equipment and systems used outdoors that may spill or leak pollutants;
- Observe the identified equipment and systems to detect leaks, or identify conditions that may result in the development of leaks;

- Establish an appropriate schedule for maintenance of identified equipment and systems; and
- Establish procedures for prompt maintenance and repair of equipment, and maintenance of systems when conditions exist that may result in the development of spills or leaks.

Specific preventative maintenance BMPs to be implemented at the facility are provided in Table 3.1 and the BMP fact sheets are included in Appendix G.

3.1.3 Spill and Leak Prevention and Response

The following spill and leak prevention and response measures will be implemented in accordance with the General Permit (Section X.H.1.c):

- Establish procedures and/or controls to minimize spills and leaks;
- Develop and implement spill and leak response procedures to prevent industrial materials from discharging through the stormwater conveyance system. Spilled or leaked industrial materials will be cleaned promptly and disposed of properly;
- Identify and describe all necessary and appropriate spill and leak response equipment, location(s) of spill and leak response equipment, and spill or leak response equipment maintenance procedures; and
- Identify and train appropriate spill and leak response personnel.

Specific spill and leak prevention and response BMPs to be implemented at the Ralphs facility are provided in Table 3.1 and the BMP fact sheets are included in Appendix G.

3.1.4 Material Handling and Waste Management

The following material handling and waste management measures will be implemented in accordance with the General Permit (Section X.H.1.d):

- Prevent or minimize handling of industrial materials or wastes that can be readily mobilized by contact with stormwater during a storm event;
- Contain all stored non-solid industrial materials or wastes (e.g., particulates, powders, shredded paper, etc.) that can be transported or dispersed by the wind or contact with stormwater during handling;
- Cover industrial waste disposal containers and industrial material storage containers that contain industrial materials when not in use;
- Divert run-on and stormwater generated from within the facility away from all stockpiled materials;
- Clean all spills of industrial materials or wastes that occur during handling in accordance with the spill response procedures (Section X.H.1.c); and
- Observe and clean as appropriate, any outdoor material or waste handling equipment or containers that can be contaminated by contact with industrial materials or wastes.

Specific material handling and waste management BMPs to be implemented at the Ralphs facility are provided in Table 3.1 and the BMP fact sheets are included in Appendix G.

3.1.5 Erosion and Sediment Controls

The following erosion and sediment control measures will be implemented in accordance with the General Permit (Section X.H.1.e):

- Implement effective wind erosion controls;
- Provide effective stabilization for all disturbed soils and other erodible areas prior to a forecasted storm event;
- Maintain effective perimeter controls and stabilize all site entrances and exits to sufficiently control discharges of erodible materials from discharging or being tracked off the site;
- Divert run-on and stormwater generated from within the facility away from all erodible materials; and
- If sediment basins are implemented, ensure compliance with the design storm standards in Section X.H.6. of the General Permit.

Specific erosion and sediment control BMPs to be implemented at the Ralphs facility are provided in Table 3.1 and the BMP fact sheets are included in Appendix G.

3.1.6 Employee Training Program

An employee training program will be implemented in accordance with the following requirements in the General Permit (Section X.H.1.f):

- Ensure that all team members implementing the various compliance activities of this SWPPP are properly trained in topics including but not limited to: BMP implementation, BMP effectiveness evaluations, visual observations, and monitoring activities;
- Prepare or acquire appropriate training manuals or training materials;
- Identify which personnel need to be trained, their responsibilities, and the type of training they will receive;
- Provide a training schedule; and
- Maintain documentation of all completed training classes and the personnel that received training in the SWPPP.

The Pollution Prevention Team will receive annual training in implementing the various compliance activities specified in this SWPPP. New Pollution Prevention Team members, who join during the wet season, will receive training within thirty (30) business days of their becoming a Pollution Prevention Team member. Documentation of training activities is retained in SWPPP Appendix C.

Training that focuses on compliance with the provisions of this SWPPP will be provided to individual facility managers. It will be their responsibility to convey applicable and necessary information to their staff. If in Level 1 or Level 2 status, the facility's designated QISP will provide training to appropriate team members in accordance with Section IX.A.3.b of the General Permit.

Ralphs associates will be trained in the areas of spill response and good housekeeping. General associate training is achieved by orienting new associates to facility operating procedures; periodic staff meetings, one-on-one (or small group) training by supervisors as necessary to help prevent diversions from SWPPP practices and repeat occurrences of unacceptable practices; and written memorandums, as needed.

Task specific training for all employees engaged in activities that have the potential to cause stormwater pollution will be conducted when new employees are hired.

This facility has Baseline Training that will be performed by a qualified team member or a Qualified Industrial Stormwater Practitioner (QISP). In accordance with Section IX.A.1, the QISP will be a person who has completed a State Water Board-sponsored or approved QISP training course, and has registered as a QISP via SMARTS. The trainer will be responsible for providing information during training sessions and subsequently completing the training logs shown in Appendix C, which identifies the site-specific stormwater topics covered as well as the names of site personnel who attended the meeting. Each team member will be trained in the specific role they are responsible to undertake.

3.1.7 Quality Assurance and Record Keeping

The following quality assurance and record keeping activities will be performed in accordance with the requirements in the General Permit (Section X.H.1.g):

- Develop and implement management procedures to ensure that appropriate staff implements all elements of the SWPPP, including the Monitoring Implementation Plan (SWPPP Section 5);
- Develop a method of tracking and recording the implementation of BMPs identified in the SWPPP; and
- Maintain the BMP implementation records, training records, and records related to any spills and clean-up related response activities for a minimum of five (5) years as required in the General Permit (Section XXI.J.4).

BMPs will be implemented according to the schedule and procedures presented in SWPPP Section 4. BMPs will be implemented by properly trained team members as documented in Appendix C.

Visual observations will be performed as described in SWPPP Section 5.5. Potential pollutant sources and BMPs will be inspected during visual observations, and new BMPs will be implemented as needed. Records of visual observations of BMP implementation will be retained in Appendix H.

Paper or electronic records of documents required by this SWPPP will be retained for a minimum of five (5) years from the date generated or date submitted, whichever is later, for the following items:

- Employee Training Records;
- BMP Implementation Records;
- Spill and Clean-up Related Records;
- Records of Monitoring Information
 - The date, exact location, and time of sampling or measurement;
 - The date(s) analyses were performed;
 - The individual(s) that performed the analyses;
 - The analytical techniques or methods used; and
 - The results of such analyses;
- Level 1 ERA Reports (if applicable);
- Level 2 ERA Action Plan (if applicable);
- Level 2 ERA Technical Report (if applicable); and
- Annual Reports.

3.2 ADVANCED BMPS

3.2.1 Exposure Minimization BMPs

Storm resistant shelters are installed onsite to prevent the contact of stormwater with industrial activities and material. The locations of these shelters and associated industrial activities and materials are presented in Table 3-2.

Table 3-2. Exposure Minimization BMPs

Shelter Location/Description	Associated Industrial Activity/Material
Warehouses	Warehouse operations conducted indoors
Truck Wash Area/Maintenance Garage/Truck Fueling	Truck maintenance and washing is conducted indoors or using vehicle spill pans. Truck fueling conducted under cover.

3.2.2 Stormwater Containment and Discharge Reduction BMPs

Stormwater containment and discharge reduction BMPs include BMPs that divert, reuse, contain, or reduce the volume of stormwater runoff. Specific stormwater containment and discharge reduction BMPs to be implemented at the Ralphs facility are provided in Table 3-3 and the BMP fact sheets are included in Appendix G.

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The facility has three underground Kristar CUDO water storage infiltration systems. They are designed to intercept the required treatment volume of the disturbed area in each drainage area. The systems are made up of 4'x4'x4' cubes with an actual storage volume of 40.3 ft³/unit. The sand backfill void ratio is 0.30. Two of the systems were installed at locations during the 2008-11 construction project site to intercept nuisance flows and low storm flows and infiltrate into the ground. The CUDO system #1 is located north of the central facility building and west of the truck wash. It is made up of 14 cubes. The dimensions of the system are 10' x 30' x 6'H. The CUDO system #2 is west of the large PSC building. It is made up of 144 cubes. The dimensions of the system are 290' x 10' x 6'H. The third CUDO system was installed during the construction of the digester facility. It is located just north of the digester facility and just south of CUDO system #1. There are 28 cubes. The system dimensions are 8' x 56' x 6'.

CUDO systems #1 and #3 receive drainage from the northern driveway of the upper campus, draining the Truck Wash, Truck Maintenance, Truck fueling, inlets along the loading docks of the empty building and the northern side of the Salvage area. CUDO system #2 drains the southern driveway of the upper campus, including the drain inlets on the southern side and western side of the main warehouse, as well as the potential run on from the neighboring facility.

Table 3-3. Stormwater Containment and Discharge Reduction BMPs

CASQA Fact Sheet Number	CASQA BMP Factsheet Name	Meets Advanced BMP Requirement	BMP Used		BMP Location, Runoff Sources, and Potential Pollutants
			YES	NO	
TC-10	Infiltration Trench	✓		✓	
TC-11	Infiltration Basin	✓	✓		See Section 3.2.2
TC-12	Harvest and Reuse	✓		✓	
TC-20	Wet Pond	✓		✓	
TC-21	Constructed Wetland	✓		✓	
TC-22	Extended Detention Basin	✓		✓	
TC-30	Vegetated Swale			✓	
TC-31	Vegetated Buffer Strip			✓	
TC-32	Bioretention	✓		✓	
TC-40	Media Filter			✓	
TC-50	Water Quality Inlet			✓	
TC-60	Multiple Systems	✓		✓	
MP-20	Biotreatment			✓	
MP-40	Stormwater Filter			✓	
MP-50	Wet Vault			✓	
MP-51	Gravity Separator			✓	
MP-52	Drain Inlet Insert	✓		✓	
Alternate BMPs Used:					If used, state reason:

3.2.3 Treatment Control BMPs

Treatment control BMPs include one or more mechanical, chemical, biologic, physical, or any other treatment process technology and is sized to meet the treatment control design storm standard. Specific treatment control BMPs to be implemented at the Ralphs facility are provided in Table 3-4 and the BMP fact sheets are included in Appendix G. REM Triton Drop Inlet media filters have been installed at select inlets throughout the property to target treatment of pollutants of concern. The media installed in each filter is a blend of expanded hydrophobic perlite and activated carbon to target the pollutants of concern at the facility. The See site maps in Appendix A for specific filter insert locations.

3.2.4 Other Advanced BMPs

No other advanced BMPs have been implemented at this time.

Table 3-4. Treatment Control BMPs

CASQA Fact Sheet Number	CASQA BMP Factsheet Name	Addresses O&M for Advanced BMPs	BMP Used		BMP Location, Runoff Sources, and Potential Pollutants
			YES	NO	
TC-10	Infiltration Trench	✓		✓	
TC-11	Infiltration Basin	✓		✓	
TC-12	Harvest and Reuse			✓	
TC-20	Wet Pond	✓		✓	
TC-21	Constructed Wetland	✓		✓	
TC-22	Extended Detention Basin	✓		✓	
TC-30	Vegetated Swale	✓		✓	
TC-31	Vegetated Buffer Strip	✓		✓	
TC-32	Bioretention	✓		✓	
TC-40	Media Filter	✓		✓	
TC-50	Water Quality Inlet	✓		✓	
TC-60	Multiple Systems	✓		✓	
MP-20	Biotreatment	✓		✓	
MP-40	Stormwater Filter	✓		✓	
MP-50	Wet Vault	✓		✓	
MP-51	Gravity Separator	✓		✓	
MP-52	Drain Inlet Insert	✓	✓		REM Triton Drop Inlet Media Filters, see Section 3.2.3
Alternate BMPs Used:			If used, state reason:		

3.3 BMP SUMMARY TABLE

Table 3-5 summarizes the industrial activities, materials, pollutant sources, potential pollutants, and BMPs being implemented to prevent discharge of pollutants in stormwater runoff. Descriptions of the specific BMPs being implemented were provided in previous subsections. Implementation and maintenance of BMPs is described in Section 4.

Table 3-5. BMP Summary Table

Industrial Activity/Material	Pollutant Sources	Potential Pollutants	BMPs Implemented	CASQA BMP Fact Sheet Number	Required Equipment and Tools
Loading and Unloading Product	Misc. Material, Debris	Misc. Material, Debris	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	SC-10, SC-11, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52	Spill prevention kits, various tools as-needed, H&S supplies.
Product Storage	Misc. Material, Debris, Organic Material, Oil and Grease, Diesel Fuel	Misc. Material, Debris, Organic Material, Oil and Grease, Diesel Fuel	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	SC-10, SC-11, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52	Spill prevention kits, various tools as-needed, H&S supplies.
Compactors	Misc. Material, Debris, Organic Material	Misc. Material, Debris, Organic Material, Nitrate, Nitrite	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	SC-10, SC-11, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52	Spill prevention kits, various tools as-needed, H&S supplies.
Truck Maintenance	Oil and Grease, Antifreeze, Degreasers, Solids	Oil and Grease, Antifreeze, Degreasers, Solids	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	SC-10, SC-11, SC-20, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52	Spill prevention kits, various tools as-needed, H&S supplies.

Table 3-5. BMP Summary Table

Industrial Activity/Material	Pollutant Sources	Potential Pollutants	BMPs Implemented	CASQA BMP Fact Sheet Number	Required Equipment and Tools
Oil Water Separators	Organic Material, Oil and Grease	Organic Material, Oil and Grease	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	SC-10, SC-11, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52	Spill prevention kits, various tools as-needed, H&S supplies.
Truck Washing	Industrial Detergents, Cleaning Materials, Oil and Greas, Metals, Solids	Industrial Detergents, Cleaning Materials, Oil and Greas, Metals, Solids	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	SC-10, SC-11, SC-21, SC-22, SC-30-35, TC-11, TC-50, MP-52	Spill prevention kits, various tools as-needed, H&S supplies.
Truck Fueling	Diesel Fuel, Oil and Grease	Diesel Fuel, Oil and Grease	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	SC-10, SC-11, SC-20, SC-21, SC-22, SC-30-35, TC-11, TC-50, MP-52	Spill prevention kits, various tools as-needed, H&S supplies.
Hazardous Material Storage and Handling	See Table 2-2	See Table 2-2	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	SC-10, SC-11, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52	Spill prevention kits, various tools as-needed, H&S supplies.
Equipment Storage	Misc. Material, Debris, Oil and	Misc. Material, Debris, Oil and Grease, Diesel	Material Handling and Waste Management, Spill Prevention	SC-10, SC-11, SC-21, SC-22,	Spill prevention kits, various

Table 3-5. BMP Summary Table

Industrial Activity/Material	Pollutant Sources	Potential Pollutants	BMPs Implemented	CASQA BMP Fact Sheet Number	Required Equipment and Tools
	Grease, Diesel Fuel	Fuel	and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	SC-30-35, SC-41, TC-11, TC-50, MP-52	tools as-needed, H&S supplies.
Waste Handling/Disposal	Misc. Material, Debris	Misc. Material, Debris, Nitrate, Nitrite	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	SC-10, SC-11, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52	Spill prevention kits, various tools as-needed, H&S supplies.
Facilities Maintenance	Misc Metals, lubricants, oil and grease	Misc Metals, lubricants, oil and grease	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	SC-10, SC-11, SC-21, SC-22, SC-30-35, SC-41, SC-42, TC-11, TC-50, MP-52	Spill prevention kits, various tools as-needed, H&S supplies.

4.0 BMP IMPLEMENTATION

4.1 BMP IMPLEMENTATION SCHEDULE

The schedule for implementing all minimum and advanced BMPs is presented in Table 4-1. BMPs will be implemented as necessary to reduce or prevent transport of industrial pollutants in stormwater runoff. Slight modifications to this schedule may be necessary to achieve this goal. Records of BMP implementation will be included in Appendix H.

Table 4-1. BMP Implementation Schedule

Industrial Activity/Material and Location	BMP Description	Person Responsible for Implementing BMPs	Date and Time of Implementation	Implementation Duration
Loading and Unloading Product	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager /Maintenance Staff	As-Needed/ Inspected Monthly	As-Needed
Product Storage	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager /Maintenance Staff	As-Needed/ Inspected Monthly	As-Needed
Compactors	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager /Maintenance Staff	As-Needed/ Inspected Monthly	As-Needed
Truck Maintenance	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager /Maintenance Staff	As-Needed/ Inspected Monthly	As-Needed

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Table 4-1. BMP Implementation Schedule

Industrial Activity/Material and Location	BMP Description	Person Responsible for Implementing BMPs	Date and Time of Implementation	Implementation Duration
Oil Water Separators	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager /Maintenance Staff	As-Needed/ Inspected Monthly	As-Needed
Truck Washing	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager /Maintenance Staff	As-Needed/ Inspected Monthly	As-Needed
Truck Fueling	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager /Maintenance Staff	As-Needed/ Inspected Monthly	As-Needed
Hazardous Material Storage and Handling	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager /Maintenance Staff	As-Needed/ Inspected Monthly	As-Needed
Equipment Storage	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager /Maintenance Staff	As-Needed/ Inspected Monthly	As-Needed
Waste Handling/Disposal	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization,	Maintenance Manager /Maintenance Staff	As-Needed/ Inspected Monthly	As-Needed

Table 4-1. BMP Implementation Schedule

Industrial Activity/Material and Location	BMP Description	Person Responsible for Implementing BMPs	Date and Time of Implementation	Implementation Duration
	Oil/Water Separators Discharges to Sanitary Sewer, CUDO System			
Facilities Maintenance	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager /Maintenance Staff	As-Needed/ Inspected Monthly	As-Needed

4.2 BMP INSPECTION AND MAINTENANCE

The General Permit requires, at a minimum, monthly observations of BMPs, along with inspections during sampling events. Monthly observations will be conducted during daylight hours of scheduled facility operating hours and on days without precipitation. A BMP observation checklist must be filled out for and maintained on-site with the SWPPP. The observation checklist includes the necessary information as discussed in Section 5.5. A blank observation checklist can be found in the monthly BMP inspection log, and completed checklists will be kept in Appendix H or in an accompanying file/binder that is referenced in the SWPPP and readily accessible on site.

BMPs, including filter inserts, will be maintained regularly to ensure proper and effective functionality. Filters will be replaced when degraded or ineffective in accordance with Section X.H.1.b. of the General Permit.

Specific guidance for maintenance, observation, and repair of advanced BMPs can be found in the BMP Factsheets in Appendix G.

5.0 MONITORING IMPLEMENTATION PLAN

5.1 PURPOSE

This Monitoring Implementation Plan was developed to address the following objectives:

1. Identify the monitoring team;
2. Describe weather and rain event tracking procedures;
3. Describe discharge locations, visual observations procedures
4. Describe visual observation response procedures;
5. Describe sample collection and handling procedures;
6. Describe field instrumentation calibration instructions and intervals;
7. Provide justification for alternative discharge locations, Representative Sample Reduction (RSR), and Qualified Combined Samples (QCS), as applicable; and
8. Provide an example Chain of Custody form to be used when handling and shipping water quality samples to the laboratory.

5.2. WEATHER AND RAIN EVENT TRACKING

Stormwater sampling and visual observations will be conducted during Qualified Storm Events (QSEs). A QSE is defined as any precipitation event that produces a discharge for at least one drainage area and is preceded by 48 hours with no discharge from any drainage area. Weather and precipitation forecasts will be tracked to identify potential QSEs.

When targeting a QSE for stormwater sampling, the appropriate team member will weekly consult the National Oceanographic and Atmospheric Administration (NOAA) for weather forecasts. These forecasts can be obtained at <https://www.weather.gov/sgx/>. If weekly forecasts indicate potential for significant precipitation, the weather forecast will be closely monitored during the 48 hours preceding the event. Weather reports with precipitation data should be printed and maintained with the SWPPP in MIP Attachment 1 “Weather Reports” to document precipitation totals and antecedent conditions.

5.3 MONITORING LOCATIONS

Monitoring locations are shown on the Site Maps in Appendix A. Monitoring locations are described in Section 5.6.

Whenever changes in facility operations might affect the appropriateness of sampling locations, the sampling locations will be revised accordingly. All such revisions will be implemented as soon as feasible and the SWPPP amended.

5.4 SAMPLE COLLECTION AND VISUAL OBSERVATION EXCEPTIONS

Safety practices for sample collection will be in accordance with the site health and safety policies.

The collection of samples or conduct visual observations is not required under the following conditions:

- During dangerous weather conditions such as flooding and electrical storms.
- Outside of scheduled site business hours.

Scheduled site business hours are presented in Section 2.2.

If monitoring (visual observations or sample collection) of the site is unsafe because of the dangerous conditions noted above, then the appropriate team member will document the conditions for why an exception to performing the monitoring was necessary. The exception documentation will be filed in MIP Attachment 2 “Monitoring Records”.

5.5 VISUAL OBSERVATION PROCEDURES

Visual monitoring includes observations of drainage areas, BMPs, and discharge locations.

- Observations of BMPs are required to identify and record BMPs that need maintenance to operate effectively, that have failed, or that could fail to operate as intended.
- Observations of the drainage areas are required to identify any spills, leaks, uncontrolled pollutant sources, and non-stormwater discharges.
- Observations of discharge locations are required to identify the presence of visible pollutants in stormwater discharged from the facility.

Visual observations will be performed at least once every calendar month during daylight hours of scheduled facility operating hours and on days without precipitation. Visual observations will also be performed during stormwater sampling events when discharge is occurring.

5.5.1 Monthly Visual Observations

Monthly visual observations are necessary to document the presence of and to identify the source of any pollutants and non-stormwater flows. Visual observations of each drainage area shall be conducted for the following:

- The presence of indication of prior, current, or potential unauthorized NSWDS and their sources;
- Authorized NSWDS, sources, and associated BMPs to ensure compliance with General Permit Section IV.B.3.; and,
- Outdoor industrial equipment and storage areas, outdoor industrial activities areas, BMPs, and all other potential source of industrial pollutants.

In the event that monthly visual observations are not performed, an explanation must be provided in the annual report.

5.5.1.1 Outdoor Facility Operations Observations

Observe potential sources of industrial pollutants including industrial equipment and storage areas, and outdoor industrial activities. Record observations of:

- Spills or leaks; and
- Uncontrolled pollutant sources

5.5.1.2 BMP Observations

Observe BMPs to identify and record:

- BMPs that are properly implemented;
- BMPs that need maintenance to operate effectively;
- BMPs that have failed; or
- BMPs that could fail to operate as intended.

5.5.1.3 Non-Stormwater Discharge Observations

Observe each drainage area for the presence of or indications of prior unauthorized and authorized non-stormwater discharges. Record:

- Presence or evidence of any non-stormwater discharge (authorized or unauthorized);
- Pollutant characteristics (floating and suspended material, sheen, discoloration, turbidity, odor, etc.); and
- Source of discharge.

For authorized non-stormwater discharges, also document whether BMPs are in place and are functioning to prevent contact with materials or equipment that could introduce pollutants

5.5.2 Sampling Event Visual Observations

Sampling event visual observations evaluate the general appearance of the stormwater as an indicator of potential pollutants. These observations will be conducted at the same time sampling occurs at the discharge locations identified in Section 5.6.2. At each discharge location where a sample is obtained, record observations of:

- Floating and suspended materials;
- Oil and grease;
- Discoloration;
- Turbidity;
- Odors;

- Trash/debris; and
- Source(s) of any discharged pollutants

When pollutants are observed in the discharged stormwater, follow-up observations of the drainage area will be conducted to identify the probable source of the pollutants.

In the event that a discharge location is not visually observed during the sampling event, the observer shall record which discharge locations were not observed during sampling or that there was no discharge from the discharge location..

5.5.3 Visual Monitoring Procedures

Visual monitoring will be conducted by trained team members. The name(s) and contact number(s) of the site visual monitoring personnel are listed below and their training qualifications are provided in Appendix C.

Assigned inspector: Gustavo Jacinto	Contact phone: (310) 884-6031
Alternate inspector: Rudy Terry	Contact phone: (310) 884-6017

Visual observations will be documented on the *Visual Observation Log* (see MIP Attachment 3 “Example Forms”). Visual observations will be supplemented with a site-specific BMP inspection checklist. Photographs used to document observations will be referenced on the *Visual Observation Log* and maintained with the Monitoring Records in Attachment 2.

The completed logs and checklists will be kept in MIP Attachment 2 “Monitoring Records”.

5.5.4 Visual Monitoring Follow-Up and Reporting

Correction of deficiencies identified by the observations, including required repairs or maintenance of BMPs, will be initiated and completed as soon as possible. Response actions will include the following:

- Report observations to the Pollution Prevention Team Leader or designated individual;
- Identify and implement appropriate response actions;
- Determine if SWPPP update is needed;
- Verify completion of response actions; and
- Document response actions.

If identified deficiencies require design changes, including additional BMPs, the implementation of changes will be completed as soon as possible, and the SWPPP will be amended to reflect the changes.

BMP deficiencies identified in site observation reports and correction of deficiencies will be tracked on the *BMP Observation Checklist* and will be retained in the project files.

5.5.5 Visual Monitoring Locations

The observations identified in Sections 5.5.1 and 5.5.2 will be conducted at the locations identified in this section.

Visual monitoring locations are shown on the Site Maps in SWPPP Appendix A.

There are three drainage areas onsite. The drainage areas are shown on the Site Maps in Appendix A and are identified in Table 5-1.

Table 5-1. Facility Drainage Areas

Location Identifier	Drainage Area Description
Drainage Area #1	Central area of facility
Drainage Area #2	Southeast area of facility
Drainage Area #3	Northern area of facility

There are three discharge locations onsite. The site stormwater discharge locations are shown on the Site Maps in Appendix A and Table 5-2 identifies each stormwater discharge location.

Table 5-2. Stormwater Discharge Locations

Location Identifier	Discharge Location (Note Drainage Area that the discharge location drains)
Discharge Location #1 (Truck Maintenance)	Manhole in Truck Maintenance garage at NW corner of garage discharging to W. Artesia Blvd. draining Drainage Area #1
Discharge Location #2 (Wilmington Avenue)	Sheet flow to curb inlet discharging to Wilmington Ave. between truck scales and generators draining Drainage Area #2
Discharge Location #3 (Wastewater Treatment)	Sheet flow originating from wastewater treatment area prior to comingling with non-industrial discharge within Drainage Area #3

There are three stormwater storage or containment areas onsite. The stormwater storage or containment areas are shown on the Site Maps in Appendix A and Table 5-3 identifies each stormwater storage or containment area by location.

Table 5-3. Stormwater Storage and Containment Areas

Location Identifier	Description of Containment (Note Drainage Area in which the containment is located)
CUDO Systems	Infiltration systems in Drainage Area #1

5.6 SAMPLING AND ANALYSIS PROCEDURES

This section describes the methods and procedures that will be followed for stormwater sampling and analysis. It contains information for sampling schedule, sampling locations, monitoring preparation, analytical constituents, sample collection, sample analysis, and data evaluation and reporting.

5.6.1 Sampling Schedule

Stormwater samples at each discharge location will be collected and analyzed from two (2) QSEs within the first half of each reporting year (July 1 to December 31), and two (2) QSEs within the second half of each reporting year (January 1 to June 30).

A QSE is a precipitation event that:

- Produces a discharge for at least one drainage area; and
- Is preceded by 48 hours with no discharge from any drainage area.

5.6.2 Sampling Locations

Sampling locations include all locations where stormwater is discharged from the site. Discharge locations are shown on the Site Maps in Appendix A and are included in

Table 5-4. Sample Locations

Sample Location Number	Sample Location Description	Sample Location Latitude and Longitude (Decimal Degrees)
Sample Location #1 (Truck Maintenance)	Manhole in Truck Maintenance garage at NW corner of garage discharging to W. Artesia Blvd. draining Drainage Area #1	33.87197°N -118.24193°W
Sample Location #2 (Wilmington Ave.)	Sheet flow to curb inlet discharging to Wilmington Ave. between truck scales and generators draining Drainage Area #2	33.87072°N -118.23683°W
Sample Location #3 (Wastewater Treatment)	Sheet flow originating from wastewater treatment area prior to comingling with non-industrial discharge within Drainage Area #3	33.872083°N -118.241853°W

A total of 3 discharge locations have been identified on the project site for the collection of stormwater runoff samples.

Table 5-4. Sample Locations

Sample Location Number	Sample Location Description	Sample Location Latitude and Longitude (Decimal Degrees)
Sample Location #1 (Truck Maintenance)	Manhole in Truck Maintenance garage at NW corner of garage discharging to W. Artesia Blvd. draining Drainage Area #1	33.87197°N -118.24193°W
Sample Location #2 (Wilmington Ave.)	Sheet flow to curb inlet discharging to Wilmington Ave. between truck scales and generators draining Drainage Area #2	33.87072°N -118.23683°W
Sample Location #3 (Wastewater Treatment)	Sheet flow originating from wastewater treatment area prior to comingling with non-industrial discharge within Drainage Area #3	33.872083°N -118.241853°W

5.6.3 Monitoring Preparation

Samples on the project site will be collected by the following sampling personnel:

Name/Telephone Number: Gustavo Jacinto / (310) 884-6031
Alternate/Telephone Number: Rudy Terry / (310) 884-6017

An adequate stock of monitoring supplies and equipment for sampling will be available onsite prior to a sampling event. Monitoring supplies and equipment will be stored in a cool temperature environment that will not encounter rain or direct sunlight. Sampling personnel will be available to collect samples in accordance with the sampling schedule. Supplies maintained at the facility will include but are not limited to: clean powder-free nitrile gloves; sample collection equipment; coolers; appropriate number and volume of sample containers; identification labels; re-sealable storage bags; paper towels; personal rain gear; ice; and *Sampling Field Log Sheets* and Chain of Custody (CoC) forms, which are provided in MIP Attachment 3 “Example Forms”.

5.6.4 Analytical Constituents

Table 5-5 identifies the constituents identified for sampling and analysis.

Table 5-5. Analytical Constituents

Constituent	Reason
pH	Basic required constituent

Table 5-5. Analytical Constituents

Constituent	Reason
Oil and Grease	Basic required constituent
Total Suspended Solids	Basic required constituent
Total Copper	TMDL/303(d) list constituent and Pollutant Source Assessment
Total Lead	TMDL/303(d) list constituent and Pollutant Source Assessment
Total Zinc	TMDL/303(d) list constituent and Pollutant Source Assessment
Nitrate as N	TMDL/303(d) list constituent and Pollutant Source Assessment
Nitrite as N	TMDL/303(d) list constituent and Pollutant Source Assessment
Nitrate+Nitrite as N	TMDL/303(d) list constituent and Pollutant Source Assessment

Note: The Los Angeles River is currently listed as impaired on the CWA Section 303(d) List for the following constituents: Ammonia, Cyanide, Diazinon, Dissolved Oxygen, Coliform Bacteria, Cadmium, Copper, Dissolved, Zinc, Copper, Lead, Nutrients, Oil, and pH. TMDLs have been developed for Nitrogen and Metals, while a TMDL has been developed for Indicator Bacteria in the Los Angeles River Estuary.

5.6.5 Sample Collection

Samples of discharge will be collected at the designated sampling locations shown on the Site Maps in Appendix A. Samples from each discharge location will be collected within four (4) hours of:

- The start of the discharge; or
- The start of facility operations if the QSE occurs within the previous 12-hour period.

Sample collection is required during scheduled facility operating hours and when sampling conditions are safe.

Grab samples will be collected and preserved in accordance with the methods identified in Table 5-5. "Sample Collection, Preservation and Analysis for Water Quality Samples" provided in Section 5.6.6. Only team members properly trained in water quality sampling will collect samples.

The facility is not subject to Subchapter N ELGs.

Samples from different discharge locations will not be combined or composited prior to shipment to the analytical laboratory. Sample collection and handling requirements are described in Section 5.8.

5.6.6 Sample Analysis

Samples will be analyzed using the analytical methods identified in the Table 5.6. All laboratory analyses will be performed according to sufficiently sensitive test procedures and conducted according to test procedures under 40 Code of Federal Regulation part 136, including the observation of holding times, unless other test procedures have been specified in the General Permit or by the Regional Water Board.

Samples will be analyzed by:

Laboratory Name:	EMAX Laboratories, Inc.
Street Address:	1835 W. 205 th Street
City, State Zip:	Torrance, CA 90501
Telephone Number:	(310) 618-8889
Point of Contact:	Caspar Pang
ELAP Certification Number:	2672

Samples will be delivered to the laboratory by either facility personnel (preferred method), picked up by a laboratory courier, or shipped on blue ice in a cooler as needed.

Table 5-6. Sample Collection, Preservation, and Analysis for Water Quality Samples

Constituent	Analytical Method	Minimum Sample Volume	Sample Containers	Sample Preservation	Reporting Limit	Units	Maximum Holding Time
Oil and Grease	1664A	1 Liter	1L Amber glass	Ice/H ₂ SO ₄	5	mg/L	14 Days
Total Suspended Solids	SM 2540D	500mL	500 mL HDPE	Ice	1	mg/L	7 Days
pH	Calibrated pH Meter	250 mL	Sample bucket	N/A	1-14	pH units	15 minutes
Copper	EPA 200.8	500mL	500 mL HDPE	Ice/HNO ₃	0.01	mg/L	180 days
Lead	EPA 200.8	500mL	500 mL HDPE	Ice/HNO ₃	0.02	mg/L	180 days
Zinc	EPA 200.8	500mL	500 mL HDPE	Ice/HNO ₃	0.01	mg/L	180 days
Nitrate as N	EPA 300.0/353.2	250mL	250 mL HDPE	Ice/H ₂ SO ₄	0.05	mg/L	48 hours
Nitrite as N	EPA 300.0/353.2	250mL	250 mL HDPE	Ice/H ₂ SO ₄	0.05	mg/L	48 hours
Nitrate+Nitrite as N	EPA 300.0/353.2	250mL	250 mL HDPE	Ice/H ₂ SO ₄	0.05	mg/L	28 days
Notes:							

5.6.7 Data Evaluation and Reporting

The designated member of the Pollution Prevention Team will complete an evaluation of the water quality sample analytical results.

Sampling and analytical results for individual samples will be submitted via SMARTS within 30 days of obtaining final signed laboratory reports for each sampling event.

The method detection limit will be provided when an analytical result from samples taken is reported by the laboratory as a “non-detect” or less than the method detection limit. A value of zero will not be reported.

Analytical results that are reported by the laboratory as below the minimum level (often referred to as the reporting limit) but above the method detection limit will be provided.

Reported analytical results will be averaged automatically by SMARTS at the end of the reporting year. For any calculations required by the General Permit a value of zero shall be used for effluent sampling analytical results that are reported by the laboratory as “non-detect” or less than the Method Detection Limit (MDL) and for results reported as estimated or “Do Not Quantify” for results less than the Reporting Limit (RL) but greater than the MDL (“J” flagged data).

5.7 TRAINING OF SAMPLING PERSONNEL

Sampling personnel will be trained to collect, maintain, and ship samples in accordance with the General Permit and this SWPPP. Training records of designated sampling personnel are provided in Appendix C.

The stormwater sampler(s) and alternate(s) have received the following stormwater sampling training:

Name	Training
Gustavo Jacinto	SWPPP review, sampling and handling training from laboratory, facility specific training, documentation, reporting.
Rudy Terry	SWPPP review, sampling and handling training from laboratory, facility specific training, documentation, reporting.

5.8 SAMPLE COLLECTION AND HANDLING

5.8.1 Sample Collection

Samples will be collected at the designated sampling locations shown on the Site Maps and listed in the preceding sections. Samples will be collected, maintained, and shipped in accordance with the requirements in the following sections.

Grab samples will be collected and preserved in accordance with the methods identified in preceding sections.

To maintain sample integrity and prevent cross-contamination, sample collection personnel will follow the protocols below.

- Collect samples (for laboratory analysis) only in analytical laboratory-provided sample containers;
- Wear clean, powder-free nitrile gloves when collecting samples;
- Change gloves whenever something not known to be clean has been touched;
- Change gloves between sites;
- Decontaminate equipment (e.g. bucket, tubing) prior to sample collection using a trisodium phosphate water wash, distilled water rinse, and final rinse with distilled water. (Dispose of wash and rinse water appropriately, i.e., do not discharge to storm drain or receiving water). Do not decontaminate laboratory provided sample containers;
- Do not smoke during sampling events;
- Never sample near a running vehicle;
- Do not park vehicles in the immediate sample collection area (even non-running vehicles);
- Do not eat or drink during sample collection; and
- Do not breathe, sneeze, or cough in the direction of an open sample container.

The most important aspect of grab sampling is to collect a sample that represents the entire runoff stream. Typically, samples are collected by dipping the collection container in the runoff flow paths and streams as noted below.

- For small streams and flow paths, simply dip the bottle facing upstream until full.
- For larger stream that can be safely accessed, collect a sample in the middle of the flow stream by directly dipping the mouth of the bottle. Once again making sure that the opening of the bottle is facing upstream as to avoid any contamination by the sampler.
- For larger streams that cannot be safely waded, pole-samplers may be needed to safely access the representative flow.
- Avoid collecting samples from ponded, sluggish, or stagnant water.
- Avoid collecting samples directly downstream from a bridge as the samples can be affected by the bridge structure or runoff from the road surface.
- Do not stand upstream of the sampling point within the flow path.

Note, that depending upon the specific analytical test, some containers may contain preservatives. These containers should **never** be dipped into the stream, but filled indirectly from the collection container.

5.8.2 Sample Handling

Field pH measurements must be conducted immediately. Do not store pH samples for later measurement.

Samples for laboratory analysis must be handled as follows. Immediately following sample collection:

- Cap sample containers;
- Complete sample container labels;
- Sealed containers in a re-sealable storage bag;
- Place sample containers into an ice-chilled cooler;
- Document sample information on the *Sampling Field Log Sheet*; and
- Complete the CoC.

Samples for laboratory analysis must be maintained between 0-6 degrees Celsius during delivery to the laboratory. Samples must be kept on ice, or refrigerated, from sample collection through delivery to the laboratory. Place samples to be shipped inside coolers with ice. Make sure the sample bottles are well packaged to prevent breakage and secure cooler lids with packaging tape.

Ship samples that will be laboratory analyzed to the analytical laboratory right away. Hold times are measured from the time the sample is collected to the time the sample is analyzed. The General Permit requires that samples be received by the analytical laboratory within 48 hours of the physical sampling (unless required sooner by the analytical laboratory).

5.8.3 Sample Documentation Procedures

Original data documented on sample bottle identification labels, *Sampling Log*, and CoCs will be recorded using waterproof ink. If an error is made on a document, sampling personnel will make corrections by lining through the error and entering the correct information. The erroneous information will not be obliterated. All corrections will be initialed and dated.

Duplicate samples will be identified consistent with the numbering system for other samples to prevent the laboratory from identifying duplicate samples. Duplicate samples will be identified in the *Sampling Log*.

Sample documentation procedures include the following:

Sample Bottle Identification Labels: Sampling personnel will attach an identification label to each sample bottle. Sample identification will uniquely identify each sample location.

Field Log Sheets: Sampling personnel will complete the *Effluent Sampling Field Log Sheet* and *Receiving Water Sampling Field Log Sheet* for each sampling event, as appropriate.

Chain of Custody: Sampling personnel will complete the CoC for each sampling event for which samples are collected for laboratory analysis. The sampler will sign the CoC when the sample(s) is turned over to the testing laboratory or courier.

5.9 QUALITY ASSURANCE AND QUALITY CONTROL

An effective Quality Assurance and Quality Control (QA/QC) plan will be implemented as part of the IMP to ensure that analytical data can be used with confidence. QA/QC procedures to be initiated include the following:

- Field logs;
- Clean sampling techniques;
- CoCs;
- QA/QC Samples; and
- Data verification.

Each of these procedures is discussed in more detail in the following sections.

5.9.1 Field Logs

The purpose of field logs is to record sampling information and field observations during monitoring that may explain any uncharacteristic analytical results. Sampling information to be included in the field log include the date and time of water quality sample collection, sampling personnel, sample container identification numbers, and types of samples that were collected. Field observations should be noted in the field log for any abnormalities at the sampling location (color, odor, BMPs, etc.). Field measurements for pH and turbidity should also be recorded in the field log. A Visual Inspection Field Log is included in MIP Attachment 3 “Example Forms”.

5.9.2 Clean Sampling Techniques

Clean sampling techniques involve the use of certified clean containers for sample collection and clean powder-free nitrile gloves during sample collection and handling. As discussed in Section 6.8, adoption of a clean sampling approach will minimize the chance of field contamination and questionable data results.

5.9.3 Chain of Custody

The sample CoC is an important documentation step that tracks samples from collection through analysis to ensure the validity of the sample. Sample CoC procedures include the following:

- Proper labeling of samples;
- Use of CoC forms for samples; and
- Prompt sample delivery to the analytical laboratory.

Analytical laboratories usually provide CoC forms to be filled out for sample containers. An example CoC is included in MIP Attachment 3 “Example Forms”.

5.9.4 Data Verification

After results are received from the analytical laboratory, the discharger will verify the data to ensure that it is complete, accurate, and the appropriate QA/QC requirements were met. Data must be verified as soon as the data reports are received. Data verification will include:

- Check the CoC and laboratory reports.
Make sure all requested analyses were performed and all samples are accounted for in the reports.
- Check laboratory reports to make sure hold times were met and that the reporting levels meet or are lower than the reporting levels agreed to in the contract.
- Check data for outlier values and follow up with the laboratory.
Occasionally typographical errors, unit reporting errors, or incomplete results are reported and should be easily detected. These errors need to be identified, clarified, and corrected quickly by the laboratory. Especially note data that is an order of magnitude or more different than similar locations, or is inconsistent with previous data from the same location.
- Check laboratory QA/QC results.
EPA establishes QA/QC checks and acceptable criteria for laboratory analyses. These data are typically reported along with the sample results. Evaluate the reported QA/QC data to check for contamination (method, field, and equipment blanks), precision (laboratory matrix spike duplicates), and accuracy (matrix spikes and laboratory control samples). When QA/QC checks are outside acceptable ranges, the laboratory must flag the data, and usually provides an explanation of the potential impact to the sample results.
- Check the data set for outlier values and accordingly, confirm results and re-analyze samples where appropriate.
Sample re-analysis should only be undertaken when it appears that some part of the QA/QC resulted in a value out of the accepted range. Sample results may not be discounted unless the analytical laboratory identifies the required QA/QC criteria were not met and confirms this in writing.

Field data including pH measurements and visual observations must be verified as soon as the Visual Observation and Sampling Logs are received, typically at the end of the monitoring event. Field data verification will include:

- Check logs to make sure all required measurements were completed and appropriately documented;
- Check reported values that appear out of the typical range or inconsistent;
Follow-up immediately to identify potential reporting or equipment problems, if appropriate, recalibrate equipment after sampling;
- Verify equipment calibrations;
- Review observations noted on the logs; and
- Review notations of any errors and actions taken to correct the equipment or recording errors.

5.10 RECORDS RETENTION

Records of stormwater monitoring information and copies of reports (including Annual Reports) must be retained for a period of at least five (5) years from date of submittal or longer if required by the Regional Water Board.

Results of visual observations, field measurements, and laboratory analyses must be kept in the SWPPP along with CoCs, and other documentation related to the monitoring.

Records to be retained include:

- The date, place, and time of inspections, sampling, visual observations, and/or measurements, including precipitation;
- The individual(s) who performed the inspections, sampling, visual observation, and/or field measurements;
- The date and approximate time of field measurements and laboratory analyses;
- The individual(s) who performed the laboratory analyses;
- A summary of analytical results, the method detection limits and reporting limits, and the analytical techniques or methods used;
- QA/QC records and results;
- Visual observation and sample collection exception records; and
- The records of any corrective actions and follow-up activities that resulted from analytical results, visual observations, or inspections.

MIP ATTACHMENT 1: MONITORING RECORDS

Place visual observation logs, sampling logs, and analytical reports in this attachment.

***Ralphs Compton Distribution Center
Storm Water Pollution Prevention Plan***

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MIP ATTACHMENT 2: EXAMPLE FORMS

**Ralphs Compton Distribution Center
Storm Water Pollution Prevention Plan**

NIV5

Visual Observation Log - Monthly	
Date and Time of Inspection:	Report Date:
Facility Name: Ralphs, Inc. – Compton Distribution Center	
Weather	
Antecedent Conditions (last 48 hours):	Current Weather:
NSWD Observations	
Were any authorized non-stormwater discharges observed?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Were any unauthorized non-stormwater discharges observed?	Yes <input type="checkbox"/> No <input type="checkbox"/>
If yes to either, identify source:	
Outdoor Industrial Equipment and Storage Area Observations	
Complete Monthly BMP Inspection Report	Yes <input type="checkbox"/> No <input type="checkbox"/>
Drainage area #1:	Were any deficiencies or any other potential source of industrial pollutants observed? Yes <input type="checkbox"/> No <input type="checkbox"/>
Drainage area #2:	Were any deficiencies or any other potential source of industrial pollutants observed? Yes <input type="checkbox"/> No <input type="checkbox"/>
Drainage area #3:	Were any deficiencies or any other potential source of industrial pollutants observed? Yes <input type="checkbox"/> No <input type="checkbox"/>
If yes to any, describe:	
Exception Documentation (explanation required if inspection could not be conducted).	
Inspector Information	
Inspector Name:	Inspector Title:
Signature:	Date:

**Ralphs Compton Distribution Center
Storm Water Pollution Prevention Plan**

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MONTHLY BMP INSPECTION REPORT

Part I. General Information

Site Information

Facility Name: **Ralphs, Inc. – Compton Distribution Center**

Facility Address: 2201 S. Wilmington Ave., Compton, CA 90220

Photos Taken:
(Circle one)

Yes ☐ No ☐

Notes:

Exception Documentation (explanation required if inspection could not be conducted).

**Ralphs Compton Distribution Center
Storm Water Pollution Prevention Plan**

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Part II. BMP Observations. Describe deficiencies in Part III.								
CASQA Fact Sheet Number	CASQA BMP Fact Sheet Name	Addresses Minimum General Permit BMP Requirements					Inspect all BMPs implemented and identify failures or other deficiencies	
		Good Housekeeping	Preventative Maintenance	Spill and Leak Prevention and Response	Material Handling and Waste Management	Erosion and Sediment Control	Are there deficiencies or potential source of industrial pollutants observed? YES/NO/Not Applicable (N/A)	Deficiency Number
SC-10	Non-Stormwater Discharges	✓		✓				
SC-11	Spill Prevention, Control, and Cleanup			✓				
SC-21	Vehicle and Equipment Cleaning	✓	✓	✓	✓			
SC-22	Vehicle and Equipment Maintenance and Repair	✓	✓	✓	✓			
SC-30	Outdoor Loading and Unloading	✓		✓	✓			
SC-31	Outdoor Liquid Container Storage	✓	✓	✓	✓			
SC-32	Outdoor Equipment Operations	✓	✓	✓	✓			
SC-33	Outdoor Storage of Raw Materials	✓	✓	✓		✓		
SC-34	Waste Handling and Disposal	✓	✓	✓	✓			
SC-40	Contaminated or Erodible Surfaces					✓		
SC-41	Building and Grounds Maintenance	✓		✓	✓			
SC-42	Building Repair, Remodeling, and Construction	✓		✓	✓	✓		
SC-43	Parking Area Maintenance	✓	✓	✓				
SC-44	Drainage System Maintenance	✓	✓	✓				
Additional BMPs Implemented: Inlet Filters, CUDO Systems								

**Ralphs Compton Distribution Center
Storm Water Pollution Prevention Plan**

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Part II. BMP Observations. Describe deficiencies in Part III.

Advanced BMP Descriptions	Inspect all BMPs implemented and identify where they are not adequately designed, implemented and/or effective.	
	Are there Deficiencies? YES/NO/Not Applicable (N/A)	Deficiency Number
Exposure Minimization BMPs		
Production operations conducted indoors (warehouse/creamery)		
Truck maintenance and washing conducted indoors (truck wash/maintenance garage)		
Stormwater Containment, Discharge Reduction, and Treatment Control BMP's		
CUDO System		
Other Advanced BMPs		
Inlet filter inserts		

Part III. Descriptions of BMP Deficiencies or Potential Source of Industrial Pollutants

Note – Corrective Actions/Repairs must be completed as soon as possible. Identify BMPs that need more frequent inspection. Note if SWPPP change is required.

Deficiency (From Part II)	Corrective Action	Implementation Schedule
1.		
2.		
3.		
4.		
5.		

**Ralphs Compton Distribution Center
Storm Water Pollution Prevention Plan**

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Visual Observation & Sampling Log – Storm Events			
Date and Time of Inspection:		Report Date:	
Facility Name: Ralphs, Co. – Compton Distribution Center			
Weather			
Antecedent Conditions (last 48 hours):		Estimate storm beginning:	
Sampling Event Observations			
Observations: If yes identify location and observe drainage area to identify probable cause			
Inspection Category	Drainage Area # 1	Drainage Area # 2	Drainage Area # 3
Odors (i.e., musty, chlorine, gasoline, chemical, organic waste, etc.)	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
Describe odor and potential source within Drainage Area:			
Floating/Suspended Material (i.e., trash, debris, sediment, etc.)	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
Describe material and potential source within Drainage Area:			
Oily Sheen	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
Describe material and potential source within Drainage Area:			
Discolorations (i.e., brown, black, milky, cloudy, murky, etc.)	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
Describe color & potential source within Drainage Area:			
NSWD Observations			
Were any non-stormwater discharges observed? (Any liquid other than stormwater entering the storm drain): Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, identify source and Drainage Area:			
Field Meter Calibration			
pH Meter ID #/Description:			
Calibration Date/Time:			

***Ralphs Compton Distribution Center
Storm Water Pollution Prevention Plan***

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Inspector Information	
Inspector Name:	Inspector Title:
Signature:	Date:

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DESTINATION LAB: EMAX Laboratories		DATE:		Lab ID:	
Client: Ralphs, Inc. ATTN: Maria Zambrano-Lozano ADDRESS: 2201 S. Wilmington Avenue Compton, CA 90220 Office Phone: Cell Phone: () - SAMPLED BY: Contact:		REQUESTED ANALYSIS TSS-SM 2540 D Oil & Grease-EPA 1664A Total Cu, Zn, Pb-EPA 200.8 Nitrate, Nitrite, Nitrate+Nitrite as N-EPA 353.2		Notes:	
Client Sample ID	Sample Date	Sample Time	Sample Matrix	Container # Type Pres.	
Sample Location #1 (Truck Maintenance)			Storm Water	4 1 Plastic 1 Amber Glass 1 Plastic 1 Plastic	None H2SO4 HNO3 H2SO4
Sample Location #2 (Wilmington Ave.)			Storm Water	4 1 Plastic 1 Amber Glass 1 Plastic 1 Plastic	None H2SO4 HNO3 H2SO4
Sample Location #3 (Main Office)			Storm Water	4 1 Plastic 1 Amber Glass 1 Plastic 1 Plastic	None H2SO4 HNO3 H2SO4
SENDER COMMENTS:					
RELINQUISHED BY					
Signature:					
Print:					
Company:					
Date:					
RECEIVED BY					
Signature:					
Print:					
Company:					
Date:					
LABORATORY COMMENTS:					
Time:					

MIP ATTACHMENT 3: FIELD METER INSTRUCTIONS

Insert field meter instructions in this section (if applicable).

MIP ATTACHMENT 4: OTHER REGULATORY DOCUMENTS

Insert other regulatory documents as needed (e.g., other regional board directives, special monitoring requirements, etc...

6.0 REFERENCES

State Water Resources Control Board (2014). Order 2014-0057-DWQ, NPDES General Permit No. CAS000001: National Pollutant Discharges Elimination System (NPDES) California General Permit for Storm Water Discharge Associated with Industrial Activities. Available online at: http://www.waterboards.ca.gov/water_issues/programs/stormwater/industrial.shtml.

CASQA 2012, *Stormwater BMP Handbook Portal: Industrial Commercial*, August 2014, www.casqa.org

Appendices

Appendix A: Site Maps

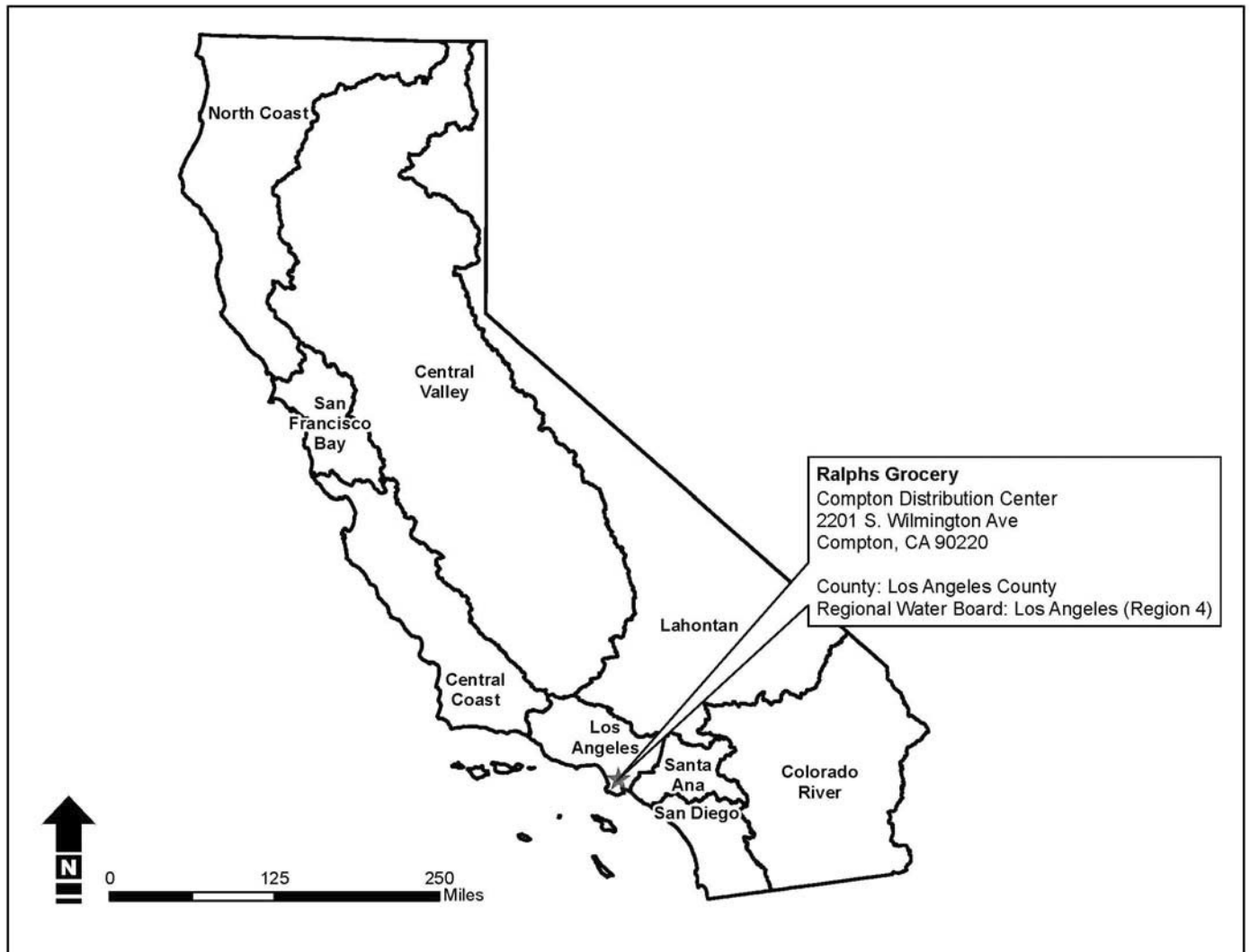


Figure A-1. Site Location Map.

County: Los Angeles County

Regional Water Quality Control Board: Region 4 Los Angeles

City: Compton, CA

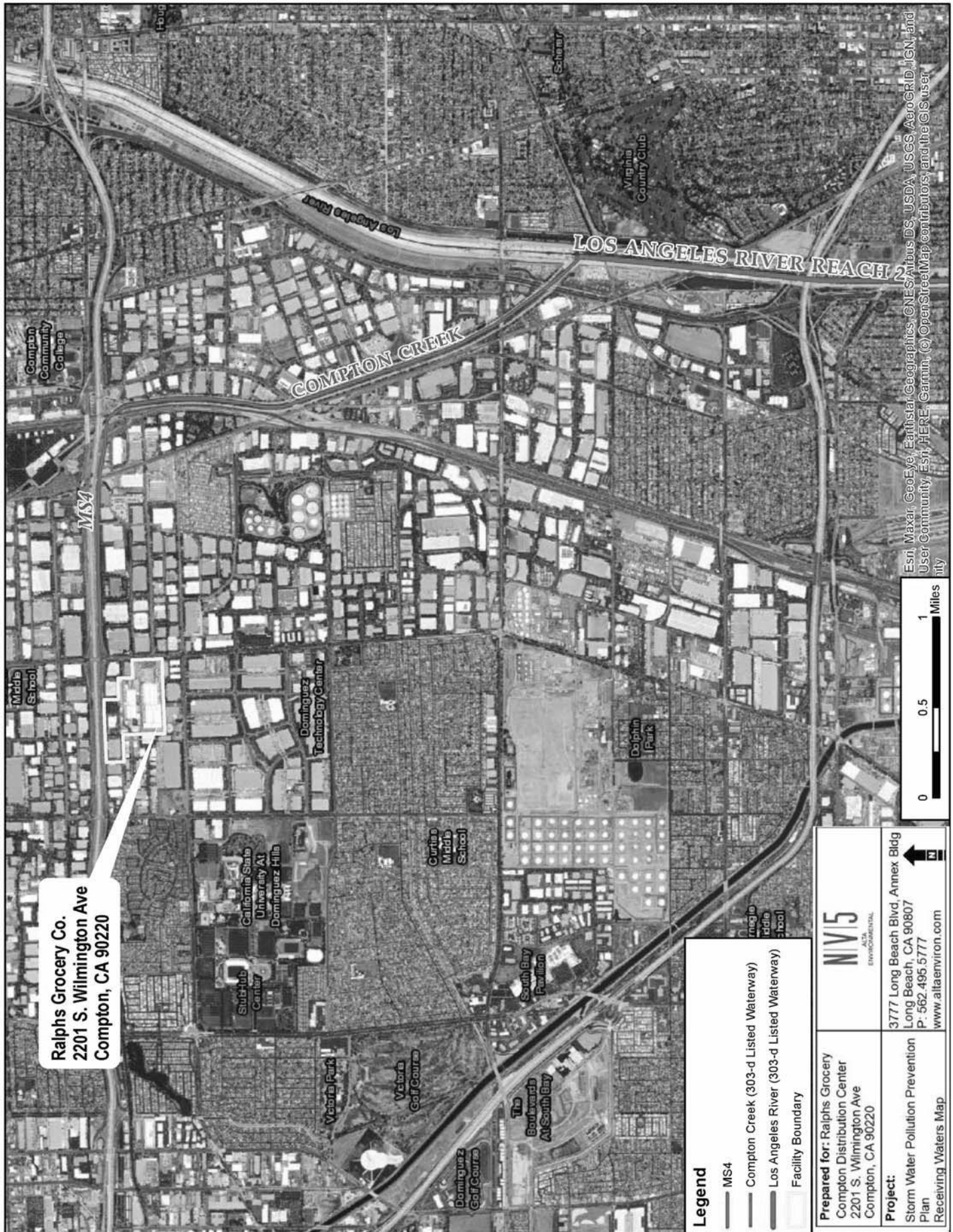


Figure A-2. Facility Location Overview Showing Receiving Water and Drainage Features

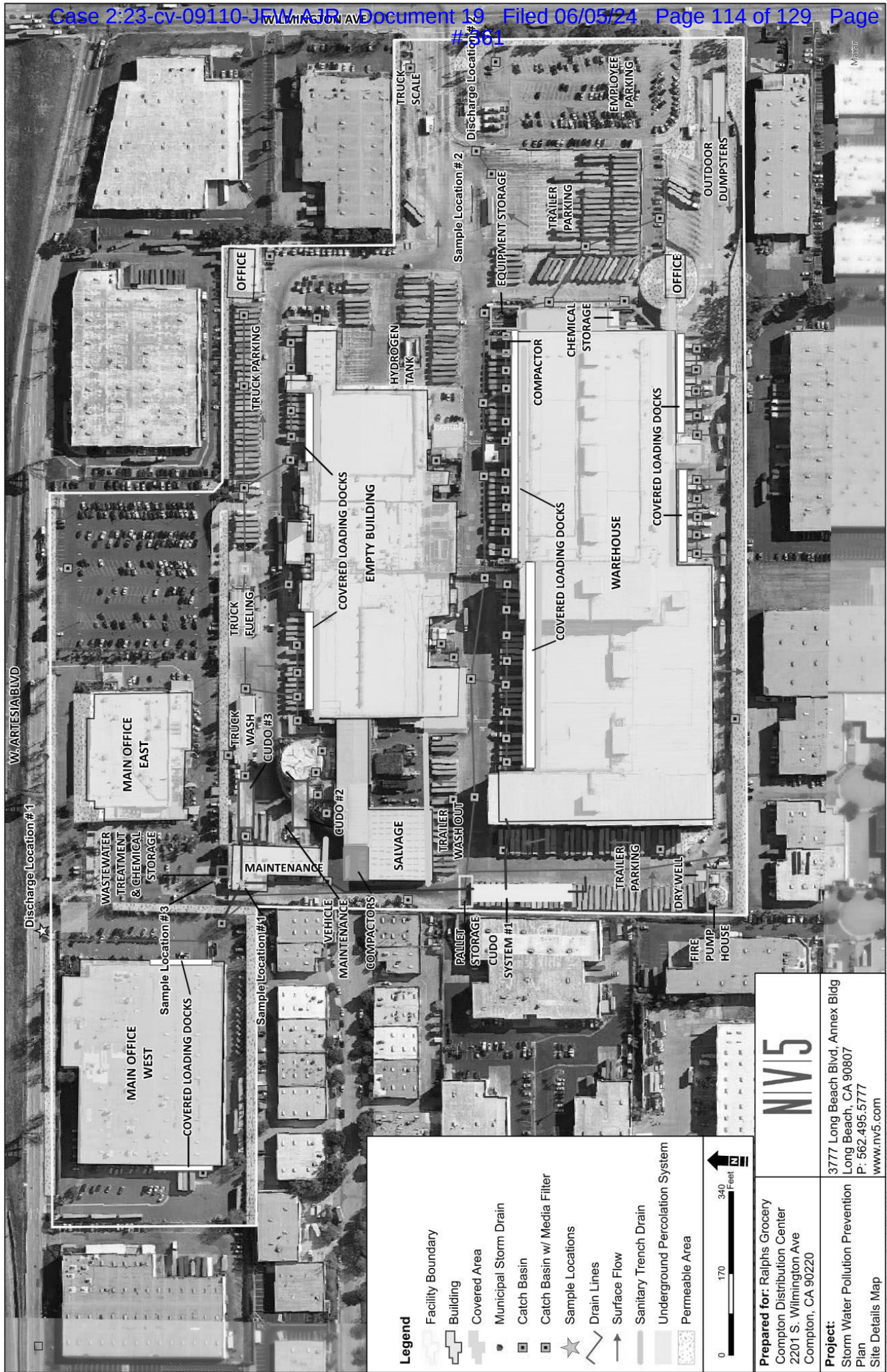
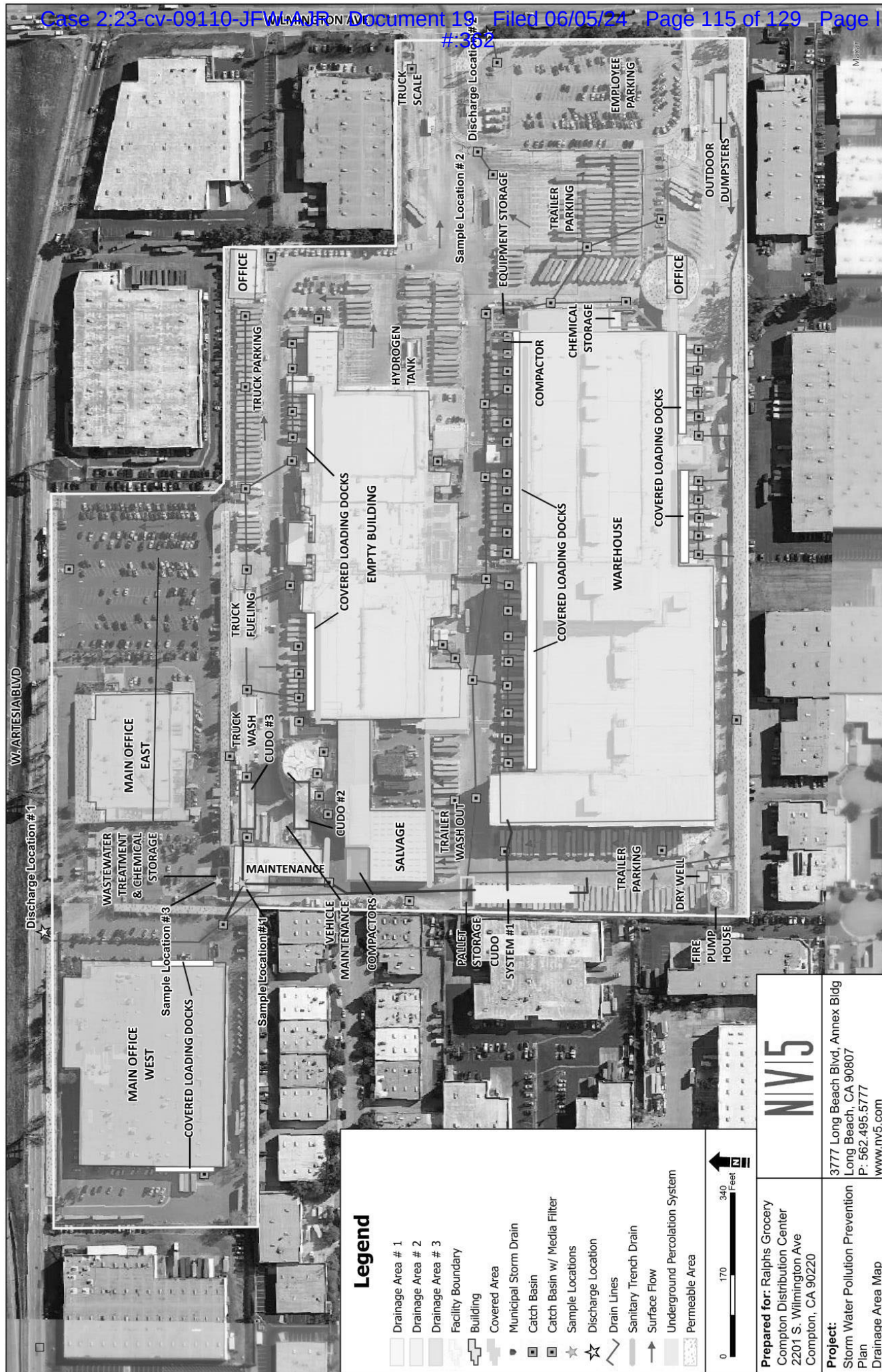


Figure A-3. Facility Location Showing Site Features, Drainage Lines, and Sample Locations



<p>Prepared for: Ralphs Grocery Compton Distribution Center 2201 S. Wilmington Ave Compton, CA 90220</p>	<p>Project: Storm Water Pollution Prevention Plan Drainage Area Map</p>
<p>NIV5</p>	<p>3777 Long Beach Blvd, Annex Bldg Long Beach, CA 90807 P: 562.495.5777 www.niv5.com</p>

Figure A-4. Facility Location Showing Drainage Areas, Site Features, and Sample Locations

Appendix B: Permit Registration Documents

Permit Registration Documents included in this Appendix

Y/N	Permit Registration Document
	Notice of Intent
	Certification
	Copy of Annual Fee Receipt
	Site Maps, see Appendix A

Appendix C: Training Reporting Form

Trained Team Member Log
Stormwater Management Training Log and Documentation

Facility Name: Ralphs- Compton Distribution Center

WDID #: 4 19I000841

Stormwater Management Topic: (check as appropriate)

- | | |
|-----------------------------------------------------------------|-----------------------------------------------------------------|
| <input type="checkbox"/> Good Housekeeping | <input type="checkbox"/> Preventative Maintenance |
| <input type="checkbox"/> Spill and Leak Prevention and Response | <input type="checkbox"/> Material Handling and Waste Management |
| <input type="checkbox"/> Erosion and Sediment Controls | <input type="checkbox"/> Quality Assurance and Record Keeping |
| <input type="checkbox"/> Advanced BMPs | <input type="checkbox"/> Visual Monitoring |
| <input type="checkbox"/> Stormwater Sampling and Analysis | |

Specific Training Objective: _____

Location: _____

Date: _____

Instructor: _____

Telephone: _____

Course Length (hours): _____

Attendee Roster (Attach additional forms if necessary)

Name	Company	Phone

As needed, add proof of external training (e.g., course completion certificates, credentials for QISP).

Appendix D: Responsible Parties

Authorization of Duly Authorized Representatives

Facility Name: Ralphps, Inc. - Compton Distribution Center

WDID #: 4 19I000841

Name of Personnel	Project Role	Company	Signature	Date

LRP's Signature

Date

LRP Name and Title

Telephone Number

Identification of QISP

Facility Name: Ralphps, Inc. - Compton Distribution Center

WDID #: 4 19I000841

The following are QISPs associated with this project

Name of Personnel ⁽¹⁾	Company	Date
David Renfrew	NV5	2.20.2019
Katlin Goodrich	NV5	3.14.2024

(1) If additional QISPs are required, add additional lines and include information here

Appendix E: SWPPP Amendment Certifications

SWPPP Amendment No. 5

Project Name: Ralphs, Inc. - Compton Distribution Center

WDID Number: 4 19I000841

Legally Responsible Person's Certification of the Stormwater Pollution Prevention Plan Amendment

"This Stormwater Pollution Prevention Plan and attachments were prepared under my direction to meet the requirements of the California Industrial General Permit (SWRCB Order No. 2014-0057-DWQ)."

LRP's Signature

Maria Zambrano-Lozano

LRP Name

Kroger/Ralphs/F4L

Affiliation

Date

Regional Manager, Environmental
Compliance, SW Region

LRP Title

(310) 884-4016

Telephone

Appendix F: Calculations

Rational Equation: $Q=ciA$

Where:

Q = Peak discharge, cfs

c = Rational method runoff coefficient

i = Rainfall intensity, inch/hour

A = Drainage area, acre

Appendix G: CASQA Stormwater BMP Fact Sheets

(Available in EH&S office files)

Appendix H: BMP Implementation Log

Table H.1 BMP Implementation Log

Industrial Activity/Material and Location	BMP Description	Person Responsible for Implementing BMP	Implementation Frequency	Implementation Description or Fact Sheet Reference
Loading and Unloading Product	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager	As-Needed/ Inspected Monthly	SC-10, SC-11, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52
Product Storage	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager	As-Needed/ Inspected Monthly	SC-10, SC-11, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52
Compactors	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager	As-Needed/ Inspected Monthly	SC-10, SC-11, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52
Truck Maintenance	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager	As-Needed/ Inspected Monthly	SC-10, SC-11, SC-20, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52
Oil Water Separators	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager	As-Needed/ Inspected Monthly	SC-10, SC-11, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52
Truck Washing	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager	As-Needed/ Inspected Monthly	SC-10, SC-11, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52

Industrial Activity/Material and Location	BMP Description	Person Responsible for Implementing BMP	Implementation Frequency	Implementation Description or Fact Sheet Reference
Truck Fueling	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager	As-Needed/ Inspected Monthly	SC-10, SC-11, SC-20, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52
Hazardous Material Storage and Handling	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager	As-Needed/ Inspected Monthly	SC-10, SC-11, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52
Equipment Storage	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager	As-Needed/ Inspected Monthly	SC-10, SC-11, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52
Waste Handling/Disposal	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager	As-Needed/ Inspected Monthly	SC-10, SC-11, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52
Facilities Maintenance	Material Handling and Waste Management, Spill Prevention and Cleanup Kits, Exposure Minimization, Oil/Water Separators Discharges to Sanitary Sewer, CUDO System	Maintenance Manager	As-Needed/ Inspected Monthly	SC-10, SC-11, SC-20, SC-21, SC-22, SC-30-35, SC-41, TC-11, TC-50, MP-52

Appendix I: Industrial General Permit

State Water Resources Control Board (2014). Order 2014-0057-DWQ, NPDES General Permit No. CAS000001: National Pollutant Discharges Elimination System (NPDES) California General Permit for Storm Water Discharge Associated with Industrial Activities as amended by Order 2015-0122-DWQ. Available on-line at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/industrial.shtml.

Appendix K: Hazardous Materials Inventory

On file in Maintenance Office